

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

CASE NUMBER: 1:18-cv-2350-MHC-JSA

WILLIAM ROBINSON,
Plaintiff,

vs.

FRANK JONES, et al.,
Defendants.

DEPOSITION
OF
WILLIAM ROBINSON
May 19, 2020

REPORTED BY:

Jan A. Mann, CSR
Bain & Associates
9 Dauphin Street, Suite 100
Mobile, Alabama 36602

S T I P U L A T I O N S

IT IS STIPULATED AND AGREED by and between the parties through their respective counsel, that the deposition of WILLIAM ROBINSON may be taken before Jan A. Mann, Commissioner, at the offices of 9 Dauphin Street, Suite 100, Mobile, Alabama, on the 19th day of May, 2020.

IT IS FURTHER STIPULATED AND AGREED that the signature to and the reading of the deposition by the witness is waived, the deposition to have the same force and effect as if full compliance had been had with all laws and rules of Court relating to the taking of depositions.

IT IS FURTHER STIPULATED AND AGREED that it shall not be necessary for any objections except as to form or leading questions, and that counsel for the parties may make objections and assign grounds at the time of the trial, or at the time said deposition is offered in evidence or prior thereto.

IT IS FURTHER STIPULATED AND AGREED that the notice of filing of the deposition by the Commissioner is waived.

A P P E A R A N C E S

APPEARING ON BEHALF OF THE PLAINTIFF (via video
conference):

FILIPOVITS LAW, P.C.

Mr. Jeffrey R. Filipovits

2900 Chamblee-Tucker Road, Building 1

Atlanta, Georgia 30341

APPEARING ON BEHALF OF THE DEFENDANT (via video
conference):

OFFICE OF FULTON COUNTY ATTORNEY

Ms. Ashley Palmer

141 Pryor Street, S.W., Suite 4038

Atlanta, Georgia 30303

ALSO PRESENT (via video conference):

Mr. Jonathan Loegel

Ms. Amelia Joiner

Ms. Nancy Rowan

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

I N D E X

EXAMINATION BY:	PAGE
Ms. Palmer	5

1 I, Jan A. Mann, CSR, a Court Reporter and
2 Notary Public of the State of Alabama, acting as
3 Commissioner, do certify that on this date, as provided
4 by the Federal Rules of Civil Procedure, and the
5 foregoing stipulation of counsel, there came before me
6 at the offices of Bain & Associates, 9 Dauphin Street,
7 Suite 100, Mobile, Alabama, on May 19, 2020, beginning
8 at 9:14 a.m. CST, WILLIAM ROBINSON, witness in the above
9 cause for oral examination, whereupon the following
10 proceedings were had:

11
12 WILLIAM ROBINSON,
13 being first duly sworn, was examined and testified as
14 follows:

15
16 EXAMINATION BY MS. PALMER:

17 Q. This is the deposition of Mr. William
18 Robinson, the plaintiff in the matter of William
19 Robinson v. Fulton County, Georgia, a civil action.
20 File number 1:19 (sic) -c, as in cat, v, as in Victor,
21 02350. It's currently pending in the United States
22 District Court for the Northern District of Georgia.

23 This deposition is being taken pursuant
24 to notice and for all lawful purposes allowed under the
25 Federal Rules of Civil Procedure. Today's date is May

1 19, 2020. The time is 10:14 a.m. Eastern Standard Time.
2 The time is 9:14 Central Standard Time, which will
3 become relevant in just a second.

4 We are doing this deposition via video
5 conference to which counsel to the parties, myself and
6 Mr. Filipovits, previously stipulated. Plaintiff is
7 located in Mobile, Alabama with the court reporter. His
8 counsel is located at a location here in Metro Atlanta.
9 I'm in Cobb County where my home is located and we also
10 have my colleagues joining me from various locations,
11 Amelia Joiner, Jonathan Loegel and Nancy Rowan.

12 Mr. Robinson, I believe as Mr. Filipovits
13 already advised you before we went on the record, my
14 name is Ashley Palmer and I am here representing the
15 remaining defendants in this matter. That would be
16 Deputies Jones and Saunders. The court reporter has
17 already sworn you in and so those are preliminary
18 matters though I would like to just make sure we cover
19 before we move forward with the deposition.

20 MS. PALMER: Mr. Filipovits, do you agree
21 to reserve all objections except as to form until first
22 use?

23 MR. FILIPOVITS: I do.

24 Q. Okay. So Mr. Robinson, these preliminary
25 matters that I spoke about, they are as follows. Do you

1 understand I'm going to be asking you questions about
2 the subject of the lawsuit that you filed against my
3 clients?

4 A. Yes, ma'am.

5 Q. All right. Can you hear me okay --

6 A. Yes, ma'am.

7 Q. -- from where you're located?

8 A. Yes, ma'am.

9 Q. All right. All right. If you don't hear
10 a question, please don't hesitate to ask me to repeat it
11 or if you don't understand the question, please let me
12 know and I will rephrase it so hopefully you do
13 understand. Remember your answers have to be audible
14 and so the court reporter can only write down what you
15 actually say. She can't report nodding and you shaking
16 your head. So when answering, please use yes or no
17 instead of uh-huh or unh-unh which we tend to fall into
18 in common parlance.

19 Please speak clearly. I will, too. I
20 tend to speak a little fast but I'm going to try to slow
21 myself down but speak clearly and concisely so that the
22 court reporter can hear you and accurately record what
23 you say. As I have said, I will do the same.

24 Please wait until I finish my question
25 before you answer. It's difficult for the court

1 reporter to take down information when both of us are
2 speaking over each other and I in turn will wait until
3 you completely finish your answer before I ask you
4 another question.

5 If you need a break at any time, please
6 let me know. I anticipate that this deposition is going
7 to go somewhere around between two and four hours and
8 typically we might break for lunch but we are not going
9 to do that because we are on this video deposition so
10 we're going to keep it moving. If you need a break, you
11 let me know, okay?

12 A. Okay.

13 Q. And please answer my questions truthfully
14 and to the best of your ability. I'm sure your attorney
15 has already told you please don't guess. If you don't
16 know the answer, just say that. It's not -- these
17 aren't trick questions. Just want the answers
18 truthfully and honestly. So other than your lawyer,
19 have you spoken to anyone else in preparation for this
20 deposition?

21 A. No. No.

22 Q. Okay. Did you review any documents in
23 preparation for this deposition?

24 A. No.

25 Q. Okay. And there may be some documents

1 that I share with you. We're going to navigate through
2 that. I practiced for the first time sharing last
3 weekend. It went fairly flawlessly so we will hopefully
4 see how that process works today. Are you under the
5 influence of any drugs including prescribed medication
6 or any other intoxicant which would affect your memory
7 or your ability to testify in this matter?

8 A. No.

9 Q. Okay. Would you please state your full
10 name for the record?

11 A. William Steven Robinson.

12 Q. Okay. And is that Steven, S-t-e-v-e-n,
13 or S-t-e-p-h-e-n?

14 A. V-e-n.

15 Q. Okay. Have you ever gone by any other
16 name?

17 A. No.

18 Q. Have you ever used a nickname or --

19 A. No.

20 Q. -- have you booked into the jail, booked
21 you in under an alias of any kind?

22 A. No, no nicknames or aliases.

23 Q. Okay. How old are you?

24 A. Forty-four.

25 Q. Okay. And when is your birthday?

1 A. June 9, 1975.

2 Q. Okay. What's your current address?

3 A. 5191 Jonesboro Road, Union City,
4 Georgia.

5 Q. Okay. And you are currently in Mobile.
6 Is that because you're visiting family and friends --

7 A. Yes, ma'am.

8 Q. -- or trying to relocate? Okay.

9 A. My grandfather has terminal cancer,
10 Stage 4.

11 Q. Okay. So you're down there with your
12 family?

13 A. Yeah. Medical.

14 Q. How long have you resided in Union City?
15 You said Union City, right?

16 A. Yes, ma'am.

17 Q. How long have you resided in Union City?

18 A. Since before 2016. Say maybe 2014 or
19 '15.

20 Q. Okay. So that's where you resided in
21 2016 when this --

22 A. Yes, ma'am.

23 Q. -- incident arose?

24 Q. Okay. Who did you live with in 2016?

25 A. That was Sierra Langford.

1 Q. Okay. And who's that person?

2 A. That was an ex-girlfriend.

3 Q. Okay. You no longer reside with her?

4 A. No, ma'am. We're separated right now.

5 Q. Okay. But you resided with her in 2016,
6 May of 2016?

7 A. Yes, ma'am.

8 Q. Is she the only person?

9 A. Well, her mother stays there.

10 Q. Okay. Mom is still -- your mom is still
11 there?

12 A. Yeah.

13 Q. Okay. So when you return back, you will
14 be returning back -- you and your mom will be in the
15 house together?

16 A. You and who? Me and her mother?

17 Q. You and your mother?

18 A. No. My mother has passed. That's her
19 mother.

20 Q. Oh, her mother resided in the house with
21 you all?

22 A. Yes, yes.

23 Q. I see. Her mother still resides in that
24 house?

25 A. Yes, ma'am, as far as I can tell.

1 Q. Okay. But when you return back to Union
2 City, you're going to a house where your ex-girlfriend's
3 mother resides? That's where I'm confused.

4 A. Possibly, if we reconcile.

5 Q. Okay. I understand. All right. So your
6 girlfriend that you're currently estranged from is in
7 the house, her mother is in the house, and you
8 anticipate going back to that house if you are able to
9 reconcile. Is that right?

10 A. Possibly, yes, ma'am.

11 Q. Okay. All right. But y'all aren't
12 married?

13 A. No, ma'am.

14 Q. Do you have any children?

15 A. Yes, I have three children.

16 Q. Okay. Are they adults or --

17 A. Yes, they are. Well, two of them are
18 adults and one of them is fifteen, fifteen this year.

19 Q. Okay. So the adults, do they live in
20 Georgia?

21 A. One's in the Marines and in Florida.
22 One's in Georgia, yes, ma'am, one's in Georgia and the
23 other one is in, I believe, Las Vegas.

24 Q. Okay. The one that's in Georgia, is that
25 one of the adult children or is that the fifteen year

1 old?

2 A. That's an adult child.

3 Q. Okay. And is that adult child in Metro
4 Atlanta?

5 A. I believe.

6 Q. Or outside of the metro?

7 A. Outside of Metro Atlanta.

8 Q. Okay. All right. I ask that question
9 because if the case were to go to trial it's important
10 for us to know who's going to be on the jury pool and
11 obviously you can't have family members on the jury
12 pool, but if they're outside of Metro, they wouldn't be
13 called in to jury. You know what I mean by outside the
14 Metro, right?

15 A. Yes, ma'am. Clayton County, Cobb
16 County. Okay.

17 Q. All right. Got you. Okay. Other than
18 those three children of yours and your mother who's
19 deceased -- I'm very sorry about that -- do you have any
20 other living relatives in Georgia?

21 A. No, ma'am. My father is deceased also.

22 Q. No siblings?

23 A. Yes, but they are outside of Atlanta.

24 Q. Okay. Outside of Metro Atlanta?

25 A. Yes, ma'am.

1 Q. All right. Where do they reside?

2 A. Clayton County and --

3 Q. That's still Metro so that's what I mean
4 by Metro because Northern District covers a whole bunch
5 of counties. So all right. Let's start there. Let me
6 ask you specifically where does your adult child live in
7 Georgia?

8 A. King -- her mother was staying on King
9 Arthur last time that -- King Arthur Court so I
10 don't --

11 Q. And where is that? Do you know what city
12 that is?

13 A. Clayton, Clayton County.

14 Q. That's in Clayton. Okay. What's your
15 adult child's name that lives in Clayton?

16 A. Nadja Dean.

17 Q. That's a young lady?

18 A. Yes, ma'am.

19 Q. Okay. So Nadja is in Clayton and how
20 many siblings do you have in Georgia?

21 A. Two other siblings.

22 Q. Okay. And they both live in Clayton?

23 A. One of them stays in Clayton. The
24 other one stays in College Park.

25 Q. Okay. And what are their names?

1 A. Donald and Alexis Robinson.

2 Q. Okay. Both of them last name Robinson?

3 A. Yes, ma'am.

4 Q. Okay. All right. So how long have you
5 been down in Mobile with your grandfather?

6 A. About two or three weeks.

7 Q. Okay. All right. So I noted in your
8 responses to my interrogatories that I propounded upon
9 your counsel that you attended college for four years
10 but didn't graduate. Is that true?

11 A. Yes.

12 Q. How far did you get in the four years? I
13 mean were you a sophomore, junior?

14 A. I was a junior, and at that time, my
15 mother came down with cancer. She started with the
16 chemo so I started spending more time at home with Mom
17 and working.

18 Q. Okay. So you are lacking about a year
19 and a half worth of credit you'd say or do you know how
20 many credit hours --

21 A. About a year and a half. It depends on
22 where I go, what credits they accept so --

23 Q. Understood. Okay. Can you give me a
24 brief synopsis of your employment history? And I don't
25 mean like when you were sixteen and worked at Target. I

1 mean --

2 A. Yeah, yeah.

3 Q. Which is what I did but I mean like, you
4 know, post high school. Start there.

5 A. Okay. After I got out of high school,
6 went to college and I started out bartending.
7 Hurricane Katrina hit and I came down here and I no
8 longer wanted to bar tend because of the lifestyle so
9 I got into towing and recovery. I began towing and
10 recovery with Allstar Towing. That was the one where
11 I towed the longest with. I was on and off with them
12 for maybe seven or eight years.

13 Q. In Atlanta?

14 A. Yes, ma'am.

15 Q. Or Metro?

16 A. Metro Atlanta. I worked with B&L
17 towing cars for the city. Legacy Towing. DJV Towing.
18 JB Towing. I worked with a lot of black towing
19 companies in Atlanta. And during the course of my
20 training, I learned how to unlock cars, jump start
21 cars, do small mechanics on cars.

22 After I stopped working with towing and
23 recovery, I went into roadside on my own and opened up
24 285 Roadside. My job description was to unlock cars,
25 jump start cars, fuel deliveries, tire changes,

1 changing alternators and starters, small mechanics.
2 Anything that you can do in less than an hour, that
3 was my detail and I did that from when I quit towing
4 in maybe 2013 or '14 up until 2017 where my body could
5 no longer handle it because I got hurt and I could no
6 longer lift the tires and turn the screws or get on my
7 knees because everything was hurting so I took a
8 break.

9 Q. And did you do anything employment-wise
10 post 2017?

11 A. Yeah, I tried to work at Ted's Montana
12 Bar & Grill as a dishwasher to get my money back up to
13 go back to towing and recovery, unlocking cars but I
14 couldn't -- I didn't survive to even get a paycheck.
15 I worked maybe 40 or 50 hours and I couldn't -- I
16 couldn't -- I couldn't last. So I was replaced, of
17 course, and I've been unemployed.

18 Q. What kind of pain were you feeling as a
19 result of the towing that you had done over the numerous
20 years?

21 A. I could no longer lift the chains or
22 get on my knees to properly secure the car and, you
23 know, you have to properly secure the cars or they
24 come off. With the chains, I feel the pain in my
25 joints when I lift up the chains. Not the pain in my

1 arms but the pain in my joints where everything is
2 flexing. That's where I notice the majority of my
3 pain at and in my joints.

4 Q. So when you say joints, like legs, not
5 your arms?

6 A. Arms, arms, shoulders and knees and
7 hips. It creates a throbbing pain.

8 Q. So you said that you have been unemployed
9 since the Ted Montana Grill stint?

10 A. Yes, ma'am.

11 Q. Do you collect unemployment?

12 A. No, ma'am.

13 Q. Okay. Do you collect any form of
14 assistance?

15 A. No, ma'am.

16 Q. How do you support yourself?

17 A. Honestly I try to cut grass. I have
18 maybe one or two yards. It takes me a week to cut one
19 yard doing one part here and doing a part there and
20 then I come back and do another part and I've been
21 basically surviving off of handouts really.

22 Q. Okay. The girlfriend that you mentioned
23 earlier, does she work?

24 A. I don't -- yeah, I imagine she does.

25 Q. Okay. You don't know at this moment if

1 she's working?

2 A. No, ma'am. I disassociated with
3 everyone in Atlanta.

4 Q. Understood. So other than the 2011
5 aggravated assault charge, I know there are a couple of
6 other charges that went along with that. Do you have
7 any other criminal charges other than those?

8 A. No.

9 Q. Have you ever been involved in any other
10 civil lawsuits either as a plaintiff or a defendant?

11 A. Yes. I've been involved in a lawsuit,
12 a car accident. I remember -- recall one time when a
13 lady ran into the tow truck and that went on my DMV.

14 Q. Okay.

15 A. But she got the ticket though.

16 Q. So that was a traffic citation type
17 situation?

18 A. Yeah, she got the traffic citation and
19 all that.

20 Q. Okay. Did she sue or did you sue her or
21 did the company sue her?

22 A. The company had to sue. Yeah, the
23 company had to sue for -- to get the tow truck fixed.
24 Yes, the company did sue.

25 Q. Okay. And were you a witness? Were you

1 named? You weren't named, were you?

2 A. No.

3 Q. You were just a witness?

4 A. Yes, ma'am.

5 Q. Okay. All right. So all the times that
6 you have been incarcerated -- I'm not trying to imply
7 it's a lot. I'm just saying it's been more than one
8 time that you've been incarcerated -- it was because of
9 the 2011 case?

10 A. You mean the 2016 case?

11 Q. You had charges from 2011, your
12 aggravated assault --

13 A. Yeah, yeah, yeah, that was revocations
14 when, when I went to prison.

15 Q. So every time you've been in jail have
16 been a result of a revocation from the 2011 case?
17 Everything's been related to the 2011 case?

18 A. Mostly all. Me and Sierra, we did
19 argue a lot and I was taken down there for a simple
20 battery I remember, yeah.

21 Q. Okay. What happened with that? Did it
22 get dismissed?

23 A. Well, well, when I violated and went to
24 prison on a nolo contendere, and during the course of
25 me being in prison for the nolo contendere, the court

1 case came back up, and when I was in prison, they
2 issued a warrant. So when I got out of the prison,
3 they notified me of the warrant and I went in to a
4 sergeant's office and we had supposedly taken care of
5 that.

6 When I requested for a court date, they
7 said that it was in limbo. That's the exact
8 terminology, that that was in limbo right now. So
9 that's the one that's still open and it's in limbo.
10 There's no court date or anything for it.

11 Q. And what year was that when the simple
12 battery came about?

13 A. That was in 2017 because we was arguing
14 and she had a cut on her finger or something and I
15 think -- yeah, yeah, I went to jail for it and I
16 bumped into Markennis Jackson inside the jailhouse and
17 that's how I get the terrorist threat thing because
18 they -- I guess they thought I didn't realize
19 Markennis Jackson because he didn't have on a name tag
20 at that time. So they walked him in front of me and
21 that's how the terroristic threat thing -- because I'm
22 like, oh, I remember you, yeah. So that's how the
23 simple battery and the terroristic wound up on that
24 same arrest ticket.

25 Q. I see. And those are both still open to

1 your knowledge?

2 A. Yes, ma'am.

3 Q. And how long were you in jail on those?

4 A. When they realized that I recognized
5 Markennis Jackson, they kicked me out of the jailhouse
6 and gave me a citation. I didn't -- I wasn't
7 incarcerated. They just gave me a citation and told
8 me to come back at a late date which the date is --
9 you know, still don't know it.

10 Q. That was in 2017?

11 A. Yes, ma'am.

12 Q. Okay. Got you. So other than the simple
13 battery we discussed, the 2011 case which was the agg
14 assault that you said you pled nolo to, you got ten
15 years probation on that?

16 A. No, I didn't pled nolo. I pled guilty
17 to the aggravated assault.

18 Q. Okay.

19 A. I got ten years probation because it
20 was really a weak case. I pled out to it. My mother
21 was dying of cancer so I wasn't even risking no time
22 with that. So I pled out to it.

23 And the nolo came from me and my
24 daughter arguing. She was beating my car and throwing
25 bricks and stuff through the window of my car. So the

1 police come out and they asked me what's going on.
2 I'm like she's throwing bricks through the car, blase
3 blah blah. He's like you want to work her. I'm like
4 no, let her go.

5 And then she calls the police on me and
6 she says that I kicked her through a wall, but then
7 when we go to court, they change their lie because it
8 was a lie. They changed it up and the judge like, no,
9 I'm throwing it out and he gave me the nolo
10 contendere. It should have been a nolo prosecute but
11 it was a nolo contendere. Even which ways, I signed
12 it which was a violation of the probation because I
13 could only take prosecute. Nolo contenderes are not
14 acceptable as a guilty plea from what I've learned.

15 Q. Got you.

16 A. And that was the trigger for me to go
17 to prison because it was a violation of the probation
18 even though I didn't do anything wrong and I made the
19 wrong plea and I learned the hard way.

20 Q. And what year was that when you got sent
21 to prison?

22 A. That was I believe 2018. It had to be
23 2017 or '18 --

24 Q. Okay.

25 A. -- when I was released. I think it was

1 in September.

2 Q. Okay. And the charge with your daughter
3 that you pled nolo to, was it a cruelty to children?
4 Was she an adult or a child?

5 A. A child.

6 Q. Okay.

7 A. She was sixteen.

8 Q. Okay.

9 A. Yeah. It was a nolo case. It wasn't
10 cruelty to children or anything like that. I think it
11 was like trespassing or something but, yeah, I just
12 pled to it.

13 Q. Okay. Got you. So tell me -- we're
14 going to move to the current lawsuit now so May 2016.
15 Tell me about the circumstances behind your
16 incarceration in the Fulton County Jail in May 2016.

17 A. Okay. Me and probation officer,
18 V. Mims, were not seeing eye to eye. I kept asking
19 for a new probation officer and revocations because I
20 was working roadside. And when I went into her
21 office, I had to pay for parking, right, and she never
22 kept a time of the probation.

23 So if I had to go in there at 12
24 o'clock, I wouldn't get seen until two, 2:30 and I'm
25 paying for parking and I'm losing calls on my job. So

1 finally I got frustrated with it and I'm, like, if
2 revocation I'd rather do my time in jail to get it all
3 out of the way and just be gone for one specific
4 amount of time than to take off two times or how many
5 ever many times to come into the office and still lose
6 because I keep giving them excuses. I'd rather give
7 them one big excuse at one time. So we went to the
8 court. The judge agreed and I went to jail from the
9 courthouse, the judge -- fifteen days so --

10 Q. Okay.

11 A. So I go to the jailhouse and I put my
12 hands on the wall just like everybody would, you know,
13 hands on the wall. And while my hands on the wall, a
14 deputy behind me grabs my arm, which causes the
15 shoulder injury, and he slams me on the ground. As
16 soon as --

17 Q. What date was this? Do you remember what
18 date this was?

19 A. This was -- this was as soon as I got
20 out of the court. I was booked into the facility. It
21 was not -- it's before even intake. It's pat down,
22 pat down to intake. They pat you down for weapons and
23 drugs.

24 Q. I think May 2, 2016. Does that sound
25 right? Or if you can't remember, it's fine.

1 A. It's, it's right after I went to -- May
2 2nd or May 3rd.

3 Q. Okay.

4 A. May 2nd or May 3rd. It's like, you
5 know, right after I went to court. From the court,
6 they put me in handcuffs from the courthouse to the
7 jailhouse.

8 Q. Okay. And you went to Rice Street?

9 A. Yes, ma'am.

10 Q. Okay. So the officers pat you down and
11 you say he injured your shoulder. Was it on purpose or
12 was he just --

13 A. It was intentionally -- it was
14 intentionally. When he slammed me to the ground, he's
15 like what is that you have in your hand. And by that
16 time, other deputies in black suits came in and I had
17 nothing in my hand at all. I didn't have anything in
18 my hand. There was no reason for him to touch me. My
19 face was to the wall -- I mean my back was to him. He
20 just grabbed my arm and commenced the breakage.

21 And when I hit the ground and it
22 started burning, I couldn't open up my arm. And of
23 course they threw me in the chair and I'm screaming
24 like (deponent makes sound) in pain because it's
25 throbbing like real throb inside like a broken bone

1 throb type pain, throb with a heartbeat and I'm
2 basically hollering, like, hollering in pain.

3 I guess they think that's aggressive.
4 Throw me in the chair and they wheel me to a part of
5 the intake where there's just a hallway and there's a
6 padded room a little bit further down. And I'm
7 strapped to a chair and I sit strapped to a chair for
8 hours and I'm, like, in pain, tears, pain like I need
9 help.

10 I realize that broken bones need to be
11 addressed immediately so I'm trying to get this
12 addressed immediately before it starts to heal. They
13 think that I'm trying to demand that I be processed or
14 I'm bullying my way or whatnot. I'm not bullying my
15 way. I'm in pain and it needs to be addressed.

16 They say, all right, get out of the
17 chair. They put me in this padded room. You calm
18 down. I'm like, man, this has nothing to do with
19 calm. This is pain. Right. I need to get this --
20 this is pain. And it's not thirty minutes. This is
21 hours of it just paining, burning.

22 Finally they let me out of the room and
23 they say, okay, we're going to bring you to medical.
24 Okay. Sit in that seat right there, and when shift
25 change comes through, we're going to take you to

1 medical.

2 I showed the guy that was at the desk
3 where they put a thumbprint in and I showed him where
4 the bone's sticking up. And I'm like, man, this is
5 not right. The bone is sticking out of my shoulder
6 and I compared it to the other shoulder. I'm like
7 something is wrong with my shoulder. It's hurting
8 bad, man. I'm like -- he's like sit right there, man.
9 It don't look right. It don't look right. We're
10 going to take you to medical. So I sat there
11 patiently.

12 Then finally shift change comes. He
13 gets up and I think I'm going to medical. The guy
14 grabs me and the pain struck again so I pull away.
15 When I pull away, blank period. Blank period when I
16 pull away. When I come to, I'm being drug by my
17 ankles and I'm handcuffed with my hands behind my back
18 towards the room where you see on video where their
19 faces are smudged out. They stopped dragging me there
20 and they say get up and walk.

21 I tried to get up and walk, but by the
22 guy dragging me by my ankles, the shackles gripped
23 into my ankles. I mean they're gripped into it. They
24 are cutting into my ankles. So I stand up. I walk a
25 few paces and realize how tight they are. I mean

1 they're extremely tight, cutting tight and I'm like,
2 man, I can't, I can't walk. And that's when you see
3 him drag me into the shower area. He be dragging --

4 Q. Who is he?

5 A. Say --

6 Q. You say he drug you into a shower area.
7 Who is he?

8 A. The tag that he named -- had on was
9 Rafferty Fuqua but --

10 Q. Okay.

11 A. -- it was not Rafferty Fuqua. Okay.
12 So he drags me into the shower, right, and I'm
13 cussing, blase blah. He started with the hitting.
14 When he hit me, my hands were behind my back and my
15 feet were shackled.

16 First it started off as a slap and it
17 aggravated me so I taunted. I said you hit like a
18 bitch. My old lady hits harder than you. When I said
19 that, the slap --

20 Q. You said that to the man who had the tag
21 that said Rafferty Fuqua?

22 A. Yes, to the man wearing the tag
23 Rafferty Fuqua. That's when punches -- I mean that's
24 when slaps turned into punches and I'm, like, bitch,
25 I'm handcuffed. I guess he thought that, like, that

1 if the handcuffs were off that I was going to fight.
2 I'm, like, man, I'm handcuffed. You're a coward.
3 You're a coward with a badge on. You hit me while I'm
4 handcuffed.

5 Drags me into the shower. That's when
6 the assault and the tasing went on. It was like --
7 when I looked in his eye, it seemed to me like he was
8 getting enjoyment out of it, like shocking me from one
9 part to the other. Shock to the lower part, of
10 course. And the whole time where he's shocking me,
11 when he -- he uncuffs my hands. I'm still shackled by
12 the feet and he's hitting me.

13 And at some point when I was handcuffed
14 and shackled, I couldn't even block the hit. I just
15 had to take the hit. So as he's taking the handcuffs
16 off, like I said, he never -- he never took them both
17 off at the same time. It was either one or the other.
18 It was accompanied with a hit, a kick or a tase.

19 So finally he hits me. I remember when
20 the teeth crushed down, it tasted like hard rock and
21 hard shell when I bit down. That's when I knew, like,
22 that he was really hurting me so I'm cussing.

23 They laugh and joke. Markennis Jackson
24 is on the right-hand side. Saunders is on the
25 left-hand side. Saunders said absolutely nothing. He

1 just looked, but if I would have responded physically,
2 then, you know, Saunders would have jumped in and
3 Jackson would have jumped in. So I knew it was a
4 no-win situation.

5 Whenever they're hitting me and I'm
6 coming to, I don't remember how, how they knocked me
7 out. I don't remember that. All I remember is coming
8 to.

9 Now after the incident in the shower,
10 right, teeth are out and I'm carried out. I saw the
11 video. I was carried to another cell. When I came to
12 in that cell, I came to face down, half clothes,
13 handcuffed and shackled to a taser in the middle of my
14 back and I'm handcuffed face down.

15 And the guy that tasered me was the one
16 that had on the fake Fuqua tag on and I'm handcuffed
17 and face down. So I get up. My knees are hurting,
18 back hurting. I believe I fell.

19 And a female guard walks by, but
20 understand, I'm half clothes so -- and my hands are
21 still behind my back and my legs are still shackled
22 and I ask for help and I'm half clothes, half naked,
23 right. I mean everything is exposed. She looks at me
24 and I guess she thought that I was one of those sexual
25 type inmates because she looked at me with disgust and

1 she kept going.

2 So we get to the medical part and it
3 seemed like a movie. Like, it was surreal. So I
4 asked -- I asked them what's your names. All three of
5 them are leaning against the medical desk. Kennis
6 Jackson is first, fake Fuqua second, and Saunders
7 third. No one would give me a name. I asked them, I
8 said, man, F-u-q-u-a. Pronounce it for me. He would
9 not say nothing and I was like I know why you're not
10 saying anything. Got something for you.

11 So from there, we went to I believe it
12 was where you take your pictures and the shackles are
13 tight. I'm asking him take these shackles off again.
14 These shackles are way too tight because they had
15 already been cutting in and they were still tight.

16 They huddled in a group, not Markennis
17 Jackson. Saunders and fake Fuqua, they huddled in a
18 group. They take my picture. Then we go to medical.

19 Q. Okay. I have a bunch of questions to ask
20 you so I'm going to go back to after the incident with
21 the -- well, I want to start with the initial incident
22 that you referenced about the officer who threw you down
23 to the floor and you said broke your arm. What's that
24 person's name?

25 A. That guy, I have -- I don't know who

1 that guy was. I tried to get his name, but after
2 everything that transpired, that was the last thing on
3 my mind was remembering his name. I just remember he
4 was a dark-skinned guy around my height, low haircut.

5 Q. Okay. And so remind me how you first
6 interacted with these other officers who you say
7 assaulted you? How did that interaction come about?

8 A. You're talking about three officers,
9 the three unnamed officers?

10 Q. You're saying three, and at the
11 preliminary hearing, I think you remember that you had,
12 Judge Schwall, apparently there were four identified.
13 So are you saying --

14 A. Not --

15 Q. -- it was just -- are you saying it was
16 just --

17 A. There were three --

18 Q. Okay. Mr. Robinson, we're not talking
19 over each other, okay.

20 A. Okay.

21 Q. You may disagree with me but don't talk
22 over me.

23 A. Okay.

24 Q. I let you talk for like twenty minutes so
25 don't talk over me.

1 A. All right. All right. All right.

2 Yes, ma'am. I'm sorry.

3 Q. All right. Thank you. So going back to
4 the preliminary hearing, do you recall that?

5 A. Yes. Well, about the four officers?

6 Q. Right.

7 A. Okay.

8 Q. The preliminary hearing transcript said
9 there were four officers. Are you now testifying under
10 oath there were only three officers?

11 A. There was never four officers. It was
12 three officers.

13 MR. FILIPOVITS: Stop for a second.
14 Ashley, if you're going to ask him about the contents
15 of the document, can we show it to him so we can --

16 MS. PALMER: Certainly. I'll pull it
17 up.

18 MR. FILIPOVITS: Thank you.

19 MS. PALMER: Give me a second to pull
20 it up, okay.

21 MR. FILIPOVITS: No problem.

22 MS. PALMER: Do a search to see how to
23 come up faster. Can you see my screen, Mr. Robinson?

24 MR. FILIPOVITS: Right now, we've just
25 got a blank screen but like it went to the screen

1 sharing view.

2 MS. PALMER: You can't see anything?

3 MR. FILIPOVITS: Correct.

4 MS. PALMER: It says my -- oh, I know now
5 what I did. All right. You should be able to see it
6 now.

7 MR. FILIPOVITS: Yeah, the top of your
8 web browser.

9 MS. PALMER: Let me see if I can make
10 this bigger. Still just the top part of the web
11 browser?

12 MR. FILIPOVITS: Yeah. Which transcript
13 are you trying to pull up, Ashley?

14 MS. PALMER: I am pulling up the one
15 where Judge Schwall had Deputy Fuqua, the real one,
16 under oath and asked him to identify who the people were
17 on the video and he said there were four of them.

18 MR. FILIPOVITS: Let me just -- are you
19 using that Bates number version?

20 MS. PALMER: Yes, the one that you sent
21 me. Let me go back to it. Hold on one second. So let
22 me see. I'm looking at Bates number 00847 right now.
23 Let me scroll down and see where the specific
24 information is about there being four individuals.

25 MR. FILIPOVITS: And right now, we see

1 your Gmail you've got opened up, the Zoom meeting link.
2 I wanted to let you know just in case you accidentally
3 open --

4 MS. PALMER: Oh, that shouldn't be
5 sharing. I don't know why it's not sharing this one.

6 MR. FILIPOVITS: I wanted to make sure.

7 MS. PALMER: I don't know why it's not
8 sharing this screen. You should be looking at the
9 transcript but you're not seeing that at all?

10 MR. FILIPOVITS: It's just like the
11 address bar, your tab bar on your browser.

12 MS. PALMER: That is so weird. All
13 right. I'm going to stop share for a second. Well, no,
14 I can't stop share because I have to keep looking at
15 this document. Let me --

16 MR. FILIPOVITS: Now we have your whole
17 browser so you got it --

18 MS. PALMER: Yeah, my PDF is opening.
19 The PDF I'm trying to share with you is opening up in
20 the browser rather than opening up in the PDF document
21 and my tech support has gone back to work. I need my
22 husband.

23 MR. FILIPOVITS: I don't know if you're
24 going to need this for other stuff but if you want to
25 just read to him the transcript just so --

1 MS. PALMER: Sure. Let's do that. Let's
2 do that. The other documents because they were smaller
3 I won't have the same issue sharing those but this had
4 to download and it's giving me some problems so --

5 Q. All right. So Mr. Robinson, I'm going to
6 read to you a portion of a transcript that we were just
7 talking about before Judge Schwall. Let me go to the
8 date of it to make sure that's perfected on the record.
9 January 26th of 2017, present before Judge Small --
10 Judge Schwall, excuse me, with yourself, Robinson and
11 Rafferty Fuqua.

12 So this portion of this transcript was
13 produced to me by your counsel in response to discovery
14 that I had propounded upon him. I'm going to refer you
15 to a particular Bates number. I'm going to start with
16 plaintiff's Bates stamp 00854 and I'm going to start
17 with "The Court".

18 So it says, The Court: All right, so
19 we're talking about two different dates? Mr. Fuqua: So
20 the incident -- The Court: Is that right?
21 Mr. Robinson: He is lying. What is he lying about?
22 When I came in the jailhouse, I went straight from that
23 floor. I was not there one day. The Court: You're not
24 saying that he physically -- Mr. Robinson --

25 A. I'm listening. I'm listening. Hold

1 on.

2 Q. Okay.

3 A. Background noise.

4 Q. I heard it so --

5 A. Okay.

6 Q. All right. So I'll go back to what I'm
7 reading. So the Court says you're not saying that he
8 physically abused you, he threatened you? And when he's
9 saying that, I'm assuming he's referring to Mr. Fuqua
10 who's present in court with you.

11 You stated -- this is you, Mr.
12 Robinson -- the ones that drug me in intake had on
13 Fuqua's name tag. That was Officer Jones. The ones on
14 intake. The Court: You're not saying this man kicked
15 you in the teeth or knocked your teeth out or broke your
16 toe? Mr. Robinson: If his name is Fuqua, that is the
17 guy that assaulted me.

18 The Court: You just told me he wasn't
19 the guy. Mr. Robinson: Fuqua. And then the Court
20 cuts you off and says you're telling me Jones is wearing
21 Fuqua's uniform. He's wearing Fuqua's uniform?

22 Mr. Robinson: No, it's not this man.

23 The Court: She's going to let you write
24 that down, okay? And then you say -- Mr. Robinson:
25 It's Jones because he was impersonating Fuqua. It's

1 Jackson. Jackson was making the jokes. The other
2 fat-lipped guy who's the one he's talking -- the Court
3 said who's the guy? Mr. Fuqua. That's Saunders,
4 M. Jackson and DO Jones. The Court said, all right,
5 she's writing that down for you and you can go to the
6 warrant office.

7 And then we're going to skip to another
8 part down part where Fuqua says -- I'll tell you the
9 Bates stamp number in a second. Plaintiff's number
10 00857. So you say -- the Court says I have ordered the
11 sheriff's department to give the names. I can't do
12 anything further. You said this man did not abuse you.
13 I don't condone any improper treatment or brutality and
14 these videos are in the record. They are so admitted
15 and we are now adjourned.

16 You say, Your Honor, he said he was in
17 the video, didn't you? The Court: He said he was in
18 the video. Mr. Robinson: And then he did say he was
19 not there. The Court said we're talking about two
20 different dates. He sat there and lied. And the Court
21 said it's two different dates?

22 And so in that hearing, Mr. Fuqua said he
23 was in the video. So that's four people because you
24 said there was a fake Fuqua, there's a real Fuqua and
25 there's two other people?

1 A. No, no.

2 Q. (Inaudible).

3 A. Here's, here's what it was. There was
4 three people in the video. Three people.

5 Q. I'm not talking about the video for a
6 second. I want to talk about who was physically
7 present.

8 A. Physically present?

9 Q. Three --

10 A. Two people, two people did not have on
11 a name tag and the other guy had on Fuqua's name tag
12 which turned out that it was not Fuqua. So
13 technically it's, it's, it's four people because he's
14 impersonating Fuqua but realistically there was three
15 people there because one person, one -- it was three
16 people there. One person is wearing the name tag that
17 if that person -- go ahead.

18 Q. Deputy Fuqua in that hearing said he was
19 there.

20 A. No.

21 Q. That's on the record. You're saying he's
22 lying, he was not there?

23 A. No, he was -- he was -- he was never
24 there. He was never there. If you look at
25 LaShaundra, LaShaundra Childs's statement with the

1 department of whoever, she says that she recalls Frank
2 Jones because that's -- she says Frank Jones put me in
3 handcuffs and the guy that put me in handcuffs does
4 not have on Jones's name tag. It's Fuqua. Fuqua was
5 never there. And then Saunders himself says that it's
6 Jones.

7 Fuqua was added because it's Fuqua's
8 name tag. Fuqua was never there, ever. He may have
9 been in the building, but if I can remember, Saunders
10 and Jackson, without a name tag, I remember your face.
11 I'm not good with names but I remember your face. If
12 I can remember them, then I remember who put their
13 hands on me.

14 And Fuqua, he let them use the name tag
15 because if they would have been -- if they would have
16 been tagged up right, if all of them would have had on
17 name tags, there wouldn't be this issue of who was
18 what and what was where because we got -- we got your
19 name tags but they had on false identification.
20 That's how Fuqua comes in.

21 Q. How do you know -- how do you know he let
22 them use the name tag? What evidence do you have to
23 substantiate that?

24 A. Well, well, you're right. I don't have
25 evidence to say that, hey, I gave you the name tag but

1 no officer is going to let -- well, no sheriff's
2 deputy is going to let a detention officer impersonate
3 his being without -- that guy couldn't have got access
4 to Fuqua's name tag unless Fuqua gave it to him. It's
5 impossible.

6 Police don't let corrections officers
7 use their name tags or anything. The sheriff is
8 higher than the police. It was impossible for Fuqua
9 to be there. He said in court that he was not there.
10 Then he said in court that he was there. I know that
11 you're not there because that's three people on that
12 tape that assaulted me. I lived through it. That
13 tape does not show the pain. I was there. I seen
14 three people, Jackson, Jones, fake Fuqua, a/k/a Fuqua,
15 and Saunders.

16 Q. So when Fuqua walked into the hearing
17 that day back in January of 2017, you had no idea who he
18 was? That was the first time you had seen him?

19 A. All I was going off was Fuqua -- is
20 your name Fuqua? Okay then. You're Fuqua. That,
21 that Fuqua? I was going off the name tag.

22 Q. You just said you were good with faces.
23 So I'm asking you was that the first time that you had
24 ever seen Mr. Fuqua or had you seen him before?

25 A. That's my first time ever -- I believe

1 it was my second time. During, during the thing with
2 the probation officer when I walked out the probation
3 officer's office, I noticed a deputy looked just like
4 Fuqua, the real Fuqua we're talking about. When we
5 went to court, I'm like this got to be Fuqua but I
6 didn't realize that it was this thing where Fuqua
7 would let somebody else use his name tag because
8 Jones, Jones, Jones, Jones, Jones is, is clearly
9 identified by his peers in the statements that he
10 wrote.

11 We could -- we could set aside
12 everything that I'm saying and we could go strictly to
13 their paperwork. Inside their paperwork in the OPS
14 investigation, it's clearly they identified each
15 other. LaShaundra Childs ain't never even bring up
16 Rafferty Fuqua at all and -- at all. She does not
17 even put Rafferty Fuqua there.

18 Q. I want to refer you to Plaintiff's Bates
19 stamp number 00054 which is the taser report. It
20 indicates that Mr. Fuqua's taser was the one that was
21 discharged eight times. So you are saying paperwork is
22 not putting him there but your own discovery puts him
23 there.

24 A. That's --

25 Q. So are you still saying -- okay. Don't

1 interrupt me. Now come on now. We're not going to do
2 this.

3 A. Okay.

4 Q. So are you still sticking by the point
5 that he was not there despite the OPS records show his
6 taser is the one that was discharged against you?

7 A. Okay. Once again --

8 Q. Are you aware of that? Were you aware of
9 that?

10 A. Once again, that was Frank Jones
11 holding that taser. Frank Jones was tasering me.
12 That was not Fuqua at all. That was not Fuqua. That
13 was Frank Jones with that taser. And Frank Jones had
14 on that name tag, Fuqua. That was Frank Jones with
15 that taser.

16 The reason why -- the reason why he
17 failed the lie detector test about did you use the
18 taser, because he had no knowledge of that taser being
19 used. That was Frank Jones using that taser. That
20 was not Fuqua. Fuqua --

21 Q. Who failed -- who failed the lie detector
22 test?

23 A. Fuqua, Frank Jones and --

24 Q. And --

25 A. -- Markennis Jackson. I passed it.

1 Q. Right. So when he was asked about the
2 taser, Mr. Fuqua, and he lied --

3 A. Uh-huh.

4 Q. -- which is why he got fired --

5 A. Yes.

6 Q. -- you're saying that the lie was based
7 on the fact that he had no knowledge that his taser was
8 used?

9 A. He lied -- he lied in -- he lied in --
10 when they ask you in the lie detector test, they ask
11 you a series of questions. They don't ask you one
12 question. I'm saying he --

13 Q. We're not going into that.

14 A. He told the trooper --

15 Q. Stop, stop. I need you to answer my
16 question. Are you saying -- because this is what you
17 just testified to -- that Fuqua, the reason why he
18 failed is because he lied about the fact that he was --
19 the lie was based on the fact that he was unaware that
20 somebody had used his taser? Is that what your
21 testimony is?

22 A. My testimony is he failed the lie
23 detector test because he was untruthful about the
24 ordeal.

25 Q. Right. Untruthful about the fact that he

1 had not used a taser when the records clearly show that
2 he had?

3 A. That was -- and once again, yes, ma'am,
4 that was Jones using that taser. That was not Fuqua.

5 Q. Are you aware that the sheriff's office
6 when they assign tasers to their deputies that there are
7 records that show the taser number you have been
8 assigned to?

9 A. Yes, ma'am.

10 Q. Okay. So now you think that the
11 sheriff's office is in cahoots and they lied about the
12 fact that Fuqua had a taser because that's essentially
13 what you're saying? The OPS report clearly says that
14 it's Fuqua's taser. So is it your testimony that the
15 sheriff's office is now -- everybody is in cahoots and
16 trying to say it was --

17 MR. FILIPOVITS: Object to the form.
18 It's argumentative.

19 Q. Okay. You can still answer.

20 A. Is it my opinion? Well, it's not my
21 opinion. It's fact. It's fact that they were
22 misrepresenting themselves. Those were -- he was not
23 even qualified, Jones, to even use a taser. Those
24 were sheriff's correction officers. That was not
25 Rafferty Fuqua at all. I passed the lie detector

1 test. I have no reason to lie. None at all. It does
2 not benefit me to lie on anyone. At the end of the
3 day, they did it.

4 Q. So why do you think Mr. Fuqua would have
5 put himself there as he clearly said at the January 2017
6 hearing that he was there? So why do you think he would
7 put himself there?

8 A. Because if he does not stick to his
9 lie, it would kind of, like, get everybody in trouble.
10 It's a conspiracy is what I'm saying because you don't
11 let nobody use your name tag, and if it wasn't a
12 conspiracy, why everybody failing a lie detector test?

13 Q. So going back to the incident, you said
14 that somebody put shackles around you. Who was the one
15 that put the shackles around you?

16 A. That was Jones --

17 Q. Okay.

18 A. -- wearing Fuqua's name tag, the fake
19 Jones. We just called him by Jones a/k/a Fuqua. That
20 was Jones. And LaShaundra Childs's statement, she
21 says, oh, now I recall after seeing this one. Jones.
22 She didn't say Fuqua. Jones is the one that's
23 dragging me. Jones is the only one that drug me.
24 Markennis Jackson did not touch me.
25 The comedian, he did not touch me. Saunders did not

1 touch me. Jones is the only one that touched me.

2 Jones is the only one -- well, LaShaundra Childs says
3 shackled me. Saunders also said Jones drug him into
4 the shower. That is Jones, not Fuqua.

5 Q. Okay. So if Saunders didn't touch you,
6 why are you suing him?

7 A. Because he acted as an overseer. If,
8 if I would have, he would have beaten me. Secondly,
9 his oath of office is to protect me. If he's seeing
10 that someone is abusing me especially while in
11 handcuffed and shackled, it is your duty to say, hey,
12 stop that, you can't beat him. He is -- he is
13 subdued. He can't protect himself in handcuffs and
14 shackles.

15 Q. So you acknowledge that you were cussing
16 at the officers?

17 A. Ma'am, what else could I do if you're
18 slapping me in my face? After you slap me in my
19 face --

20 Q. I mean before that. Before that, didn't
21 you say you made some reference about somebody's mama
22 and called them a bitch?

23 A. No, I didn't call nobody mama a bitch.
24 I never called nobody --

25 Q. I didn't say their mama. I said you used

1 the word bitch. Didn't you testify earlier that you
2 made some kind of comment --

3 A. When --

4 Q. -- and that's what got them all upset?

5 A. Okay. When I'm being drug into the
6 shower, I didn't recall being knocked out. I woke up
7 to being drug by my feet, by the shackles towards the
8 showers. When I woke up in pain, the first thing I
9 started doing was, oh, you a bitch.

10 That's -- what else -- what else would
11 you say when someone's dragging you by your feet with
12 iron? You're not going to wake up and say, oh, please
13 stop. You're going to wake up in the worst mood that
14 you ever woke up in your life. You been -- you coming
15 back to consciousness. I don't think anybody is going
16 to say anything nice being drug by your feet in
17 shackles like a slave.

18 Q. So why did they initially put the
19 shackles on you and drag you?

20 A. I have --

21 Q. Do you know?

22 A. I have no idea. None.

23 Q. So you are just sitting down and suddenly
24 three people -- not four -- three came and threw some
25 shackles on you?

1 A. It wasn't -- it wasn't like that.
2 After the guy -- the guy touched me and I pulled away,
3 I don't remember anything but waking up in handcuffs
4 and shackles. I don't -- I didn't -- I didn't hit the
5 guy. I didn't throw a punch. I got knocked out on
6 the floor, put in handcuffs and shackles and drug by
7 my feet.

8 Maybe they were dragging me by my feet
9 because they realized that they knocked me out and it
10 had to be some type of story where, oh, he was doing
11 something. When that guy puts those shackles on me, I
12 don't remember those shackles. I don't remember my
13 hands going behind my back. I remember being I wake
14 up and I'm being drug face down to a room.

15 I did not fight that guy. I did not
16 throw a punch. I did not say anything to the three
17 guys that were unnamed, the one with the fake name.
18 He's unnamed, too. The three, Rafferty Fuqua, the
19 fake Rafferty Fuqua, which is Frank Jones, Markennis
20 Jackson and Saunders, I don't even remember them
21 putting knee in handcuffs and shackles is what I'm
22 telling you.

23 There was not no walking up to me, oh,
24 you a bitch. No, it wasn't none of that. It wasn't
25 no, oh -- it wasn't none of that. All that came from

1 behind me because the guy was on the side of me. It
2 wasn't in front of me. It came from behind me. And
3 when I woke up, hands were behind my back. My feet
4 were shackled and I was being drug. I don't -- look
5 at the videotape, this one. It should be on this one.

6 Q. How did you get knocked out?

7 A. When you get knocked out, it ain't like
8 somebody punches you in your face and you're like, oh,
9 I'm knocked out. No, it don't work like that. When
10 you get knocked out, you just remember you be standing
11 up and then you wake up, you're on the ground. You
12 don't --

13 Q. You don't remember being hit? I mean I
14 understand what you're saying but you usually remember
15 something right before someone knocks you out. Was
16 there a pipe in their hand --

17 A. I --

18 Q. Okay. Don't interrupt me. I'm still
19 talking. Nobody had, like, a pipe in their hand. They
20 didn't punch you up side your head. You just all of a
21 sudden you feel some little twinge in your shoulder, and
22 when you wake up, you're being drug and you don't
23 remember anything about how that happened?

24 A. I was face forward as I am now. The
25 guy that pulled my shirt, he was to the right of me.

1 When he pulled me to the right, pulled against my
2 shoulder, I pulled away. As soon as I pulled away,
3 I'm being drug.

4 I don't remember contact with any of
5 those officers at all. I don't remember even -- I
6 don't even see them until stand up. Like one, two,
7 black shirt, black shirt, name tag. I can't even
8 remember even coming into contact with those guys at
9 all. I just -- I remember when I was being drug by
10 the shackles though. They hit me from behind.

11 Q. Sorry. I didn't mean to interrupt you.
12 I thought you were done. Okay. I'm sorry.

13 A. I had to be hit from behind or slammed
14 from behind or slammed on my head from behind but it
15 happened, something from behind. It had to be. Trust
16 me, if they were in front of me, I would have saw
17 them. They were not in front of me. I don't remember
18 them at all.

19 And I pulled away from that guy. Drug.
20 That's the next thing I remember, being drug past
21 those halls down to the entrance of that doorway where
22 they stopped and I stood up and I said, hey, man,
23 these things are too tight. You've been dragging me.
24 Loosen them. And then they dragged me into the
25 shower.

1 Q. So the one who pulled on your arm before
2 you got knocked out, that's the one who you don't know,
3 correct?

4 A. That guy where I was walking like right
5 before they drug me to the shower, that was -- that
6 was a sergeant. I believe that was a sergeant. I
7 don't remember his name at all. When you ask them for
8 a pen to write stuff down, they don't give it to you.
9 You can't have it because it's a hazard. You can't
10 have pens so you have to go strictly by memory.

11 Q. And is he the same one that threw you to
12 the ground and broke your arm?

13 A. No, no. That guy -- that was an older
14 guy that -- that guy was maybe ten years older than
15 me, the sergeant that I pulled away from. That was an
16 old guy. He wasn't -- he was not slamming anything
17 but I do remember him saying see what you get. He did
18 say see what you get.

19 No, the guy that separated my shoulder
20 that slammed me to the ground, he was a young guy. My
21 color. Almost my, my height but he had low hair. Two
22 different individuals.

23 Q. So as far as what you recall when you
24 awoke, you were being drug, you had shackles on you, you
25 don't know who put the shackles on but you know that

1 Mr. Jones was the one that was dragging you. Is that
2 correct?

3 A. That's what -- yes, ma'am. Jones was
4 dragging me and LaShaundra Childs verifies it in her
5 statement.

6 Q. Okay. I'm not asking about what
7 LaShaundra Childs verifies. I'm asking do you remember.

8 A. Yes, ma'am.

9 Q. Who was dragging you by the shackles?

10 A. I remember Jones -- let me tell you how
11 I remember Jones's facial structure. Because he's
12 lock jaw. His face sits sideways. When he was
13 arguing and hollering and running to the back of the
14 room trying to agitate me or to get me to fight, I
15 remember his jaw structure. Saunders had the big lip.
16 He had the awkward jaw structure and Markennis Jackson
17 was a light skinned Al B. Sure (sic) type guy. I
18 locked in their faces. I know exactly what they look
19 like.

20 The only reason why there's an issue is
21 because they were wearing fake name tags or not tagged
22 at all. If they were tagged, we wouldn't even be here
23 right now discussing who was what and who is who. At
24 the end of the day, it was someone involved in that
25 department, either -- look at the evidence.

1 Q. So in looking at the OPS report, you
2 indicated that you've seen it before. Is that true?

3 A. Seen what before?

4 Q. The OPS report?

5 A. Oh, yeah, yeah. I have it in my phone.
6 I've seen it. I thoroughly read it eighty times,
7 ninety times.

8 Q. Okay. And you're aware that OPS
9 exonerated the gentlemen for excessive force. Are you
10 aware of that?

11 A. Which one?

12 Q. All of them for excessive force. They
13 may have gotten them for other things, violation of
14 policies but you're aware that they exonerated them
15 for --

16 A. What the OPS report said was they could
17 not --

18 Q. Are you aware of that?

19 A. Yeah, they cannot -- they cannot
20 confirm. It doesn't mean they exonerated. It just
21 meant they can't prove it. They didn't exonerate
22 anything. They just said they couldn't prove it
23 because it was not on tape.

24 We caught them lying. Yes, they are
25 lying and blase blah but we don't have the physical

1 evidence but if I'm missing teeth and my shoulder is
2 broken and my toes are broken and my knees ache every
3 time I bend over, I can't get sleep or the doctors
4 keep putting me on Percocet, I don't see how.

5 Q. Well, let's talk about those injuries.
6 So you were seen by licensed practical nurse Ronald
7 Sanders, I presume no relation, immediately after this
8 incident took place. Do you recall that?

9 A. Which -- I've seen a lot of providers.
10 Which one are you speaking of?

11 Q. Licensed practical nurse Ronald Sanders.

12 A. I mean was it from --

13 Q. He saw you immediately after this
14 incident.

15 A. At the jailhouse.

16 Q. Correct.

17 A. Okay. Yes.

18 Q. And he said you had a loose tooth,
19 abrasions on your lip and multiple cuts on your arms but
20 your general appearance was of no apparent distress. So
21 are you saying Ronald Sanders misdiagnosed your broken
22 arm and your broken toe?

23 A. Well, the bone is sticking out. Yes,
24 he did. Even a layman can see that the bone is
25 sticking out. If a layperson can identify it, then a

1 trained professional should be able to also.

2 Q. But he makes no mention of your arm other
3 than cuts he said he saw and your toe. So you're saying
4 that Ronald Sanders misdiagnosed you and you never
5 brought to his attention about the broken arm and broken
6 toe?

7 A. Ma'am, after that fight, they was
8 trying to lock us down. He was not trying to give
9 adequate medical, medical attention. When I went to
10 Grady, Grady diagnosed it.

11 Q. When did you go to Grady?

12 A. As soon --

13 Q. I don't have those records.

14 A. As soon as I got out of the jailhouse.
15 I went from the jailhouse to Grady and Grady had put
16 me on the Percocets and started scheduling stuff to
17 get it taken care of but insurance stopped everything
18 from happening because I no longer had a job, was
19 unemployable.

20 MR. FILIPOVITS: Can we pause for a
21 second? Ashley, I thought I gave those to you. Can I
22 pull that up real quick?

23 MS. PALMER: Yeah, you can look at them
24 but the ones I have are from two years later. They all
25 deal with mental health issues. They don't --

1 THE DEPONENT: They most --

2 MR. FILIPOVITS: Hold on one second.

3 THE DEPONENT: Can I --

4 MS. PALMER: Listen to your lawyer.

5 THE DEPONENT: Jeff, can I take a break
6 right quick --

7 MS. PALMER: Sure. You can take a break.

8 THE DEPONENT: -- to use the bathroom?
9 I'll be right back.

10 MR. FILIPOVITS: Let me see what's going
11 on, okay, because you should have those.

12 MS. PALMER: Okay. That's fine.

13 (Brief recess.)

14 Q. (BY MS. PALMER:) While we were on a
15 break, Mr. Robinson's counsel advised there are some
16 additional medical records he is going to send over and
17 we will take a look at those shortly, my colleague will.
18 And you say those relate to when you went to the
19 hospital after were released from the jail back in 2016.
20 Is that correct --

21 A. Yes, ma'am.

22 Q. -- Mr. Robinson?

23 A. Yes, ma'am.

24 Q. All right. And do you remember when were
25 released from the jail in May 2016?

1 A. I was, I believe, the 15th or the 16th,
2 the 15th or the 16th when I was released. It was
3 fourteen -- no, it was fifteen days in jail. 15th or
4 the 16th. Around that time, 15th or the 16th.

5 Q. Okay. All right. So we were discussing
6 the incident that took place on May the 3rd. Is there
7 anything else beyond what you've already testified to
8 which is that Jones was the one who tased you and he was
9 the one that drug you in relation to Saunders or --
10 well, Sanders, Saunders specifically which is the other
11 individual I represent. You say he was standing there
12 present and did not stop the man. Is that what you're
13 saying?

14 A. Yes, ma'am. He did not -- he failed to
15 protect me.

16 Q. Is that correct?

17 A. Yes, ma'am. He failed to protect me.

18 Q. And what precipitated the tasing if you
19 recall?

20 A. Nothing. He did it because he wanted
21 to. There was -- there was no -- I did not hit him.
22 Nothing. I never showed any aggression to him. The
23 first time I came in contact with those guys was when
24 I was being drug. He never gave a command to stop,
25 sit, don't -- he never gave -- it was just a beating,

1 a drag and a beating.

2 Q. So when the OPS report says that you were
3 combative and they were trying to subdue you, that's not
4 correct?

5 A. No, ma'am. When I went to Judge
6 Schwall, Judge Schwall couldn't find where I was
7 combative either. He asked, well, where is he
8 combative. No one can point out that at all. You
9 can't -- you can't even go to the videotape and find
10 where I was combative.

11 Q. Well, let's move to an incident that took
12 place later that day between you and an inmate named
13 Enzell Woods. Do you recall Enzell Woods?

14 A. Yes, ma'am.

15 Q. That incident?

16 A. Yes, ma'am, I sure do.

17 Q. It occurred at -- okay. It occurred at
18 approximately 450 military time which would have been
19 2:50 p.m. Eastern Standard Time?

20 A. Yes, ma'am.

21 Q. Can you tell me about that altercation?

22 A. Okay. Before they arrived, there were
23 maybe four white guys and five black guys in the cell.
24 A couple of guys in the cell. It was like half and
25 half. I was speaking to an older guy -- he was about

1 maybe sixty-five years old -- about the incident that
2 happened downstairs and he was telling me, yeah, they
3 did a number on you. He was, like, boy, usually in
4 those situations, they put an inmate on you. I was,
5 like, yeah, I know. I heard about it. Like, yeah,
6 like, be careful.

7 So a guy comes in from prison and the
8 prison uniforms are different from jail uniforms. The
9 jail uniforms, they'll give you, you know, the cloth.
10 The prison uniforms are the see-through paper type of
11 uniform. So what I did was I put -- because he's
12 taking his prison thing off so I put it on because I
13 was cold on top of my jailhouse uniform.

14 So they come in, Enzell Jones and
15 another guy, and I'm sitting there talking to the old
16 guy about what happened. In the middle of me and the
17 old cat's conversation, Enzell Jones said you ain't
18 going to do nothing to him. The old guy was, like,
19 yeah, he already know. I said, yeah, we just spoke
20 about it.

21 So what I did was I walked up to Enzell
22 Jones and I sat down right in front of him and he's
23 steadily popping off at the mouth, blase blah. I
24 didn't say anything to him. I looked at the ground,
25 and when I looked up he was, like, what the fuck you

1 looking at and he swung and hit me.

2 When he hit me, I immobilized him.
3 Knocked him out, broke his nose. They come in and
4 they try to shoot with the taser gun. That's not
5 effective. We go to the ground, separated. When they
6 separate us, Enzell Jones looks at Saunders and tells
7 Saunders I didn't get a chance. That, that, that,
8 that pushed my temper.

9 So I go to cussing and I'm telling him,
10 hell, no, you don't get a chance. I grew up boxing
11 and fighting. You picked the wrong guy, right. And
12 Saunders is shaking his head and I'm talking mad junk
13 and there's a different set of officers that came in
14 this time. They don't have on black. They have on
15 green.

16 And he says, Mr. Robinson, shut up
17 before we beat you and you out of line. You can't --
18 I said, yes, sir, and I shut my mouth, but the whole
19 time where they were putting the chopsticks up his
20 nose, he's looking at Saunders and Saunders is shaking
21 his head.

22 And the other guy who he came in with,
23 you know, talking gang slang, on blood, you know, all
24 this craziness. That was crazy. You know, it was
25 crazy. I have never --

1 Q. You're talking about the same -- I'm
2 sorry. Are you referring to the same Saunders that --

3 A. Yes.

4 Q. -- I represent? My client, Mr. Saunders?

5 A. Yes, ma'am.

6 Q. All right. So you had testified earlier
7 that in the previous altercation with the three officers
8 that they knocked your teeth out. Is that correct?

9 A. Yes, ma'am.

10 Q. So isn't it correct that later when you
11 went to the doctor, which was at 5:44 p.m. that day and
12 you saw physician's assistant David Gettier (sic),
13 that's when your teeth were knocked out was by
14 Mr. Enzell Woods?

15 A. No, ma'am. When I got to --

16 Q. Okay. Let me stop you for a second. So
17 if the physician's assistant put that in their notes,
18 they're also lying about your teeth being knocked out
19 when they saw you at 5:54 p.m.?

20 A. Ma'am, okay. I had --

21 Q. That's a yes or no and then you can
22 explain. Are you saying that the physician's assistant
23 David Gettier who examined you at 5:54 p.m. after your
24 incident at 2:50 with Enzell Woods and specifically
25 noted you had a swollen lip, an upper tooth evulsion and

1 an abrasion on your left small toe, injuries that you
2 attributed to the earlier incident, you're saying that
3 that physician's assistant is lying?

4 A. Yes. What I'm saying is --

5 Q. Okay.

6 A. What I'm saying is the teeth, the
7 teeth, with the gold teeth, they file the gold teeth
8 down and they put the glue on it and they put the gold
9 teeth on top of the glue. When the incident happened
10 after being hit in the face or whatever, the enamel
11 around the teeth, right, that -- the white part was
12 all off. It was crushed down and there were jacked
13 pieces like meaning they were not straight. They were
14 tilted because it had been crushed down.

15 So when I got to the dentist, the
16 dentist was not putting teeth in. She was putting the
17 little pieces of the root back in. There were never
18 teeth at all put back into my mouth. Those were --

19 Q. I didn't say teeth were put back in your
20 mouth. I said teeth were knocked out of your mouth.
21 And you testified that the officers knocked your teeth
22 out of your mouth.

23 A. The officers.

24 Q. The physician's assistant has said that
25 the teeth were missing from your mouth when he saw you

1 at 5:54 after the incident with Enzell Woods.

2 A. Yes, ma'am. That's --

3 Q. And in fact, the records also reflect
4 that Enzell Woods picked up two of your teeth off the
5 floor and gave them to the officer?

6 A. That's not true. The teeth were in my
7 mouth. Enzell, Enzell Woods did not pick up any teeth
8 off the floor. How can I explain it? When they
9 knocked the gold out, the gold, the gold is supported
10 by the enamel, the white enamel around your teeth.

11 Every time where I was hit or whether I
12 was punched or kicked, it broke the enamel off, all
13 the enamel. So it was not -- it was a shard of a
14 tooth and they were crooked and jagged. That was the
15 whole reason why I was going to medical in the first
16 place was to get the attention for my mouth and my
17 shoulder. That's the reason why I was in medical. I
18 was not in medical just for my shoulder. I was in
19 medical for all of the damages.

20 Q. But are you talking about you were in
21 medical after the incident with the three officers? Is
22 that what you say that's why you were in medical?

23 A. Yes, that's why I was in medical in the
24 beginning.

25 Q. Right. When you were seen in medical

1 that initial time because you were seen twice that
2 day -- are we in agreement with that? You were seen
3 twice that day in medical, once after the incident with
4 the officers and once after the incident with Enzell
5 Woods?

6 A. No, no. The medical, the medical
7 department upstairs, I was seen one time in the
8 medical department upstairs. There's a medical
9 screening downstairs.

10 Q. No. Two different individuals, one named
11 Ronald Sanders, saw you earlier in the day around nine
12 a.m. after the incident with the officers which occurred
13 around 7:45 a.m. on May 3rd and then a second person saw
14 you after the incident with Enzell Woods and his name is
15 David Gettier. So you don't recall either of those
16 people looking at you?

17 A. I don't -- I don't -- I don't recall
18 going up there two times. I only went to the medical
19 floor one time. I don't -- I don't recall two times
20 at all. I'm not aware of being there two times. I'm
21 only aware of being there one time where I got into
22 the fight with the guy. That was the only time where
23 I was in medical was when I got in a fight with that
24 guy. There was never two times.

25 Q. We had just talked about earlier -- but

1 we just talked about earlier Ronald Sanders seeing you.
2 You said you had a loose tooth, abrasion on your lip,
3 and cuts on your arm. That was after the incident with
4 the officers. You and I talked about that. Okay. So
5 you're saying that didn't happen?

6 A. Hold on. You're confusing me now.
7 You're confusing me. There's a medical screening
8 downstairs.

9 Q. I'm not talking about the medical
10 screening. I know exactly what that is. People come in
11 intake. I know what that is. I'm not talking about
12 that. I'm talking about after incidents happen in the
13 jail the policy is, as you're aware and I'm aware, you
14 get taken to medical.

15 A. Unh-unh.

16 Q. And pursuant to the records, you were
17 taken twice.

18 A. I was not taken --

19 Q. What happened after -- okay. Don't
20 interrupt me again. Once after the incident with the
21 officers and the other time after the incident with
22 Enzell Woods. Two different physicians have records of
23 seeing you on that day.

24 A. Ma'am, I only went to medical one time.
25 After the shower, I went to medical. When I went to

1 medical, that's when the fight with Enzell Woods
2 happened, and from there, we went to the 7th floor.
3 I've never -- I've never gone to medical two times
4 during that incident. I only went to medical one time
5 because after the shower was medical. After medical
6 was solitary confinement.

7 Q. So if there are records reflecting that
8 you saw a licensed practical nurse named Ronald
9 Sanders --

10 A. What are the times on it?

11 Q. -- are you saying those aren't true?

12 A. What are the times on it? Are they
13 around the same time?

14 Q. They are. You saw Ronald Sanders around
15 9:45 a.m. and I can get the exact time for you.

16 A. Well, the time between the dentist
17 and -- what are the times because if they are in the
18 same time period and you're saying that's two
19 different times but it was only -- I only went up
20 there one time. I never came down a floor. I never
21 went anywhere other than medical, from that shower to
22 medical and from medical to isolation. So I don't
23 know about two times.

24 Q. Hold on a second. Pulling up the records
25 so I can give you exact time. So the incident in the

1 intake area occurred at approximately 0734 hours, which
2 is military time, 7:34 a.m. on May the 3rd. Subsequent
3 to that incident, Robinson was escorted to the medical
4 clinic by DO Frank Jones at approximately 9:27 hours
5 military time, 9:27 a.m. and placed into a cell for
6 further screening.

7 That screening was done by Ronald
8 Sanders. He said actually he did the screening at
9 approximately nine a.m. so the time is off but it was
10 subsequent to the incident and that's when he said he
11 noted your scratches to your arms, your loose tooth and
12 abrasions on your lip but that your general appearance
13 was of no apparent distress.

14 A. The loose, the loose tooth, ma'am, as I
15 have --

16 Q. No, let's not -- let's not get
17 sidetracked on the tooth for a second. We'll talk about
18 that in a second. Do you recall seeing somebody at
19 approximately between nine and 9:30 a.m. -- it looks
20 like it was at nine a.m. --

21 A. Nine a.m. --

22 Q. -- the jail clinic. But nine a.m.

23 A. If, if Saunders brought me up there and
24 it was around that time because you're not privileged
25 to time in there when you ask people.

1 Q. I understand that. I'm not trying to
2 hold you to time. You're the one that asked me about
3 time. I'm asking you did you see somebody twice. I
4 don't care what time it is. You asked about that.

5 A. Well, if it's in the same period of
6 time, it had to be if it's on record if it's in the
7 same period of time. If they brought me up there at
8 eight o'clock and I checked in at eight o'clock and I
9 didn't get seen until nine o'clock or ten o'clock,
10 okay. If you call that two times, call it two times
11 but I only visited that jailhouse facility medical one
12 time.

13 Now how many times where they took me
14 to this person or that person, I don't -- I went from
15 the shower to medical to solitary confinement. I
16 don't know -- they didn't bring me from solitary
17 confinement back to medical. I know because when I
18 got up there I stayed up there locked in that room. I
19 don't, I don't, I don't recall two times.

20 Q. Okay. Well, let's go to the time you do
21 recall after the incident with Enzell Woods. At that
22 point, they said they observed a swollen lip, an upper
23 tooth evulsion, and abrasion on your left small toe.
24 Nothing about a broken arm and nothing about a broken
25 toe.

1 A. Well, when I got to Grady, Grady said
2 that I should have been taken in sooner because
3 everything started to heal up. Grady didn't say a
4 scratch on my toe. Grady said that it had been broken
5 because it had turned purple.

6 And with my shoulder, Grady said that,
7 yes -- Grady said that it's obvious that there's a
8 separation there, but since I was not immediately
9 taken within I think it was like, what, forty-eight
10 hours, that everything had started to heal up
11 incorrectly and they suggested that I wait to see how
12 it heals up. If it didn't heal up right to come back
13 and get it corrected but they don't just prescribe you
14 Percocet with scratches or what you think hurts.

15 There has to be some type of medical evidence behind
16 it. I can't pick up anything with my left shoulder.

17 MR. FILIPOVITS: Just to jump in here, I
18 did email you guys the medical records.

19 MS. PALMER: Yeah, we got them. Thank
20 you. There's no password right, Jeff?

21 MR. FILIPOVITS: It's the same as last
22 time.

23 MS. PALMER: Okay. There's no password.
24 Jonathan asked if there was a password.

25 MR. FILIPOVITS: It's Robinson.

1 MS. PALMER: It's Robinson, Jonathan.

2 A. So during the medical --

3 MR. FILIPOVITS: Thank you.

4 A. During medical, Saunders says that he's
5 seen loose teeth, and then after the fight, you say
6 that the teeth are gone. Well, loose and jagged
7 teeth, we're not talking about enamel teeth. We're
8 talking about the root, the little black thing that's
9 inside of your teeth. That's what I had in my mouth.
10 It looked like Pumpkin Head. I looked like -- it was
11 like a horror movie tooth. It was not a tooth.

12 Q. And so you deny that Enzell Woods knocked
13 your teeth out?

14 A. Enzell Woods didn't really even get a
15 lick in that fight if you look at the videotape.

16 Q. Well, your lip was swollen, you had two
17 missing teeth, and your toe was messed up.

18 A. That --

19 Q. So if he didn't get a lick, how did all
20 that happen?

21 A. That happened downstairs. When I say
22 the teeth were jagged, they were pushed in, not --
23 your teeth are straight. When your teeth are jagged,
24 they are pushed in. Just like a baby tooth. Like
25 when you have a baby tooth, it's the same --

1 Q. I understand. I'm not -- I'm not really
2 understanding the teeth thing and I don't need you to
3 try to explain it to me. I'm trying to get you to help
4 me understand how between somebody seeing you that
5 morning at nine o'clock, whether that was in medical
6 intake or not, somebody saw you and they didn't know any
7 of this and it wasn't until after the incident with
8 Enzell Woods that something is wrong with your toe, two
9 of your teeth are knocked out and you've got a swollen
10 lip.

11 A. Ma'am.

12 Q. That was not your appearance at nine
13 o'clock that morning when somebody saw you in intake.

14 A. Okay. Let me explain. When you go to
15 the Enzell Woods paper, document that he wrote, Enzell
16 Woods also stated that I had injuries to my mouth,
17 right, where my teeth and all that -- it's in Enzell
18 Woods, right. He says that the damage came before and
19 this is his statement and the OPS --

20 Q. I read his statement. That's not what he
21 said. He said here's two teeth got knocked out of his
22 mouth and he picked them off the ground and put them in
23 a napkin and gave them to the deputy.

24 A. No. I had -- my teeth were inside my
25 mouth.

1 Q. Well, if your teeth are inside your
2 mouth, you testified that the three deputies knocked
3 your teeth out. So were your teeth in your mouth or
4 were they out of your mouth?

5 A. When your teeth are jagged --

6 Q. Because your complaint says -- your
7 complaint says they knocked your teeth out. So were
8 your teeth in your mouth or out of your mouth?

9 A. The teeth were jagged in my mouth.

10 Q. I don't know what that means. I don't
11 know what jagged in your mouth means.

12 A. Straight -- your teeth right now are
13 straight. When somebody hits them or kicks them, they
14 push in. They push in at an angle, like maybe a
15 forty-five degree angle. Right now they would
16 be considered --

17 Q. So your tooth was loose -- so your tooth
18 was loose as the nurse indicated at nine a.m. that
19 morning. Is that what you're saying?

20 A. Yes --

21 Q. When I think jagged, I think part of your
22 tooth is missing --

23 A. No, that was --

24 Q. -- like it's been crushed and missing.

25 A. No, no.

1 Q. That's not what you mean by jagged. You
2 mean your tooth was moving?

3 A. Yeah, moving inside like I could use my
4 tongue and move them.

5 Q. Right.

6 A. Like I could move them with my tongue.
7 Going to medical, I could literally put my tongue on
8 my tooth and move them when I went to medical. That's
9 what I meant by jagged because they're damn near
10 coming out of my mouth at that point. A baby could
11 have come by and pulled it out. It was just like baby
12 teeth coming out.

13 Q. So did your teeth subsequently get
14 knocked out? Did they get knocked out?

15 A. They were already out when we went to
16 medical. They were jagged.

17 Q. Where is the records that show that your
18 teeth were already out when you saw -- before Enzell
19 Woods?

20 A. You said that his teeth were loose.
21 That's what loose -- that's, that's what loose teeth
22 are. Loose teeth are not the kind that sit in your
23 mouth. When the teeth are loose, they're falling out.

24 Q. Mr. Robinson, I have three children. I
25 know what a loose tooth is and you know that is not

1 true. The nurse said you had one loose tooth. Your
2 tooth was loose. When you saw a doctor later, you were
3 missing two teeth. So are you telling me that you were
4 not missing two teeth after the incident with Enzell
5 Woods?

6 A. What I'm telling you is the teeth that
7 were there were crushed down to the root and were
8 loose. Do you understand? Like, there is no --

9 Q. Nobody ever knocked two teeth out of your
10 mouth? Because two were picked up off the ground that
11 were attributed to you. So are you saying those were
12 not your two teeth?

13 A. Ma'am --

14 Q. That's a yes or no question.

15 A. Those --

16 Q. Just yes or no. Were two teeth knocked
17 out of your mouth?

18 A. What I'm saying, that is a lie. My
19 teeth were in my mouth. When the dentist put them in,
20 I took the teeth out of my mouth. I kept them in my
21 mouth because if they would have hit the ground they,
22 they get bacteria on them. You have to keep them in
23 your mouth. The teeth were in my mouth.

24 Q. When did the dentist put teeth in your
25 mouth? When did the dentist put teeth in your mouth?

1 A. Yeah, in Rice Street. They stitched it
2 all back together. They tried to stitch it back
3 together.

4 Q. When did that occur?

5 A. That was in medical. That was in
6 medical.

7 Q. Was that after the Enzell Woods incident?

8 A. Yes, ma'am.

9 Q. So that was not after the incident where
10 in your complaint you allege that my clients knocked
11 your teeth out?

12 A. Yes, ma'am.

13 Q. Now you're saying the teeth were not out
14 of your mouth?

15 A. What I'm saying is when I went to
16 medical, I was going to medical for my shoulder and
17 for my teeth. My teeth were loose and jagged. When
18 me and Enzell Woods got into the fight, Enzell Woods
19 got one lick and then I knocked him out. They came
20 in. I'm already busted up.

21 Read Enzell Woods because I've got it
22 right here on the phone. Enzell Woods said that I had
23 a busted lip and all that before him. He said he
24 didn't do anything. I will pull that up for you right
25 now if you want me to.

1 Q. Please do and refer me to the page number
2 so we can all read together.

3 A. Okay. Enzell Woods, case number
4 16034B. I was in there for medical depression on
5 5/3/16. A group of males came in. They were trying
6 to get the officer's attention. The same time
7 Mr. Robinson took a swing at me. Before I knew it, we
8 was fighting. Mr. Robinson already had a busted lip
9 and paper in his mouth. He was telling the officers
10 that he got jumped by some inmates in booking.

11 Q. You got jumped by some inmates in
12 booking?

13 A. That's what -- that's what Enzell Woods
14 is writing. He said --

15 Q. So is that what happened? You told him
16 you got jumped by inmates --

17 A. I don't know Enzell Woods.

18 Q. So how am I supposed to believe Enzell
19 Woods if your lip is busted if he's saying inmates
20 jumped you and you're saying that's not what happened?

21 A. I never -- I never came into contact
22 with inmates until medical.

23 Q. Right. Do you understand my point,
24 Mr. Robinson?

25 A. All right. Now --

1 Q. You're trying to use Enzell Woods as a
2 credible source which first of all is not even here for
3 me to question -- don't interrupt me because you're
4 about to. And second of all, he's saying inmates jumped
5 you. Is that your testimony that inmates jumped you?

6 A. No.

7 Q. So how credible is he?

8 A. Exactly.

9 Q. (Inaudible).

10 A. Exactly. So that's why I'm wondering
11 why are you trying to use the statement of he picked
12 up two teeth off the floor.

13 Q. No. You're trying to use the statement.

14 A. Two teeth off the floor. You said you
15 used Enzell Woods two teeth off the floor and I
16 just --

17 Q. I don't have to use -- Mr. Robinson, I
18 don't have to use his statement that teeth were picked
19 up off the floor. There's other corroborating evidence
20 that two teeth were picked up and taken to the dentist.
21 You just said they tried to stitch teeth back in your
22 mouth. Did you not testify to that?

23 A. My teeth were in my mouth --

24 Q. Okay.

25 A. -- when I went to the dentist.

1 Q. Did you not testify that they attempted
2 to stitch some teeth back in your mouth? Those were
3 your exact words.

4 A. Yes, because they were loose. They
5 were loose. It wasn't -- it wasn't, oh, my teeth were
6 over there. No, it wasn't like that.

7 Q. So let me ask you this, Mr. Robinson.
8 Your complaint alleges my clients knocked your teeth
9 out.

10 A. Uh --

11 Q. Your testimony here -- don't interrupt
12 me. Your testimony here is emphatically your tooth --
13 your teeth were loose. There's a big difference in that
14 and you have tried to argue me down about the fact that
15 none of your teeth ever landed on the ground. So is it
16 your statement that you filed a complaint saying that my
17 client knocked your teeth out and that is not what any
18 of the evidence shows?

19 A. Yes, ma'am. Yes, ma'am. When your
20 client beat me in the shower, I lost my teeth. There
21 were -- when I looked in the mirror, they were crooked
22 and out of place loose, chipped, however you want to
23 say it, all the way down to the root.

24 Q. No. What I'm saying, were teeth knocked
25 out of your mouth? Yes or no.

1 A. Yes, ma'am, the teeth -- the teeth were
2 out of my mouth before I got --

3 Q. Where were they?

4 A. Huh?

5 Q. Where were they? They were knocked out
6 to where?

7 A. They were in my mouth. The teeth were
8 inside of my mouth. I'm running my teeth -- my
9 tooth -- I mean my tongue over my tooth and they're
10 hanging on by pieces of meat. It's not like, oh, pop.
11 They -- like meat, man.

12 Q. Are you talking about your real tooth or
13 the gold teeth?

14 A. The gold teeth were gone. I'm talking
15 about the real teeth under the gold teeth.

16 Q. And what did the real teeth look like
17 under the gold teeth before the incident? Do you have
18 pictures of that?

19 A. You see my real teeth here? They look
20 like this. Teeth --

21 Q. Which ones of your teeth got knocked out?
22 Please show me.

23 A. Here. All that's gone.

24 Q. So your two front teeth got knocked out?

25 A. That's four teeth. Three teeth, three

1 teeth were gone and one was -- it wasn't as bad as the
2 rest but one I got taken out in prison. They had
3 to -- they removed that one in prison so --

4 Q. So four teeth in the top of your mouth
5 got knocked out?

6 A. Four teeth at the top of my mouth.

7 Q. When the nurse indicated there was only
8 one loose tooth when you saw the nurse at nine a.m.?

9 A. One loose tooth?

10 Q. One loose tooth.

11 A. I don't know -- then where were the
12 other ones?

13 Q. That's a good question.

14 A. At nine a.m. --

15 Q. That's a good question.

16 A. If you got one loose tooth, where are
17 the other ones? When -- it's not like he just hit
18 that one tooth. There are teeth surrounding them
19 teeth. All that -- when I made it up to the medical
20 department, the teeth were gone. The white -- no
21 white, no white. Sitting straight? Oh, no, unh-unh.
22 It was like somebody -- when you kick them in, they
23 kicked in. There is no I can straighten it back out.
24 No.

25 When a tooth is broken, the bone goes

1 all the way up to your skull. That tooth is gone.
2 You can't just put it back in and expect support.
3 It's gone. If your tooth is to move out of place, it
4 has broken from the bone inside of your skull. That's
5 gone.

6 Q. So your testimony is that Enzell Woods is
7 not the one that knocked your teeth out? Is that your
8 testimony?

9 A. My testimony is Enzell Woods didn't do
10 anything. All that Enzell Woods tried to cover up the
11 beating by punching me but I stopped him immediately.
12 Check out the video. They tried to submit it. The
13 same video you're speaking of, they tried to submit
14 that to Judge Schwall. Judge Schwall saw through that
15 also. He said it didn't come from medical, not all of
16 that.

17 Q. First of all, I'm not even sure what
18 you're talking about. I don't recall seeing that, but
19 be that as it may, my question was is it your testimony
20 that Enzell Woods is not the one that knocked your teeth
21 out? That's your testimony?

22 A. My testimony is Enzell Woods was not
23 the one that harmed me at all. Enzell Woods did not
24 harm me. Those were the deputies downstairs. I
25 passed a lie detector.

1 Q. I didn't ask you anything about a lie
2 detector, okay. Just answer my questions. So which
3 deputy is the one that hit you and loosened your teeth?

4 A. That would be Jones a/k/a Fuqua, fake
5 name tag Fuqua Jones who was the only --

6 Q. How many times did he strike you?

7 A. That's hard to say. It's been some
8 time. I was in -- when he was beating me, I wasn't he
9 hit me one time, that's two times. I was not
10 counting. I was trying to shield myself and get out
11 of harm's way. I can't say that he hit me ten times.
12 I can't say that.

13 Q. And he struck you with a closed fist or
14 an open hand?

15 A. Both. And feet.

16 Q. So he stomped you, too?

17 A. I believe it was once or twice where I
18 was kicked.

19 Q. In your face?

20 A. Yes.

21 Q. So he slapped you with the open hand,
22 punched you and kicked you in your face yet there's no
23 medical records to substantiate that?

24 A. No.

25 Q. How is that?

1 A. You tell me. I don't have control over
2 the jailhouse. All I can do is do what they tell me.
3 I don't have control. When I opted to go -- I said,
4 hey, man, I need to go to medical. When I pushed the
5 issue, that's when all this began for me asking for
6 medical attention. Nobody should be deprived of
7 medical attention.

8 Q. I don't think the records indicate that
9 you were deprived. You saw the nurse at nine a.m. and
10 at 5:54 p.m. So at what point was there deprivation of
11 medical attention?

12 A. Well, when my hands were on the wall
13 and that guy separated my shoulder, from that point of
14 me being intaked all the way up until -- that's
15 unnecessary. Seven, eight hours. Nine, ten hours
16 sitting there in that pain. Medical ain't nothing but
17 a floor up. Ain't no reason why I had to sit ten,
18 twelve hours without medical attention. None.

19 Q. Where is the medical records in the jail
20 about your arm? You saw two separate individuals and
21 there's no indications that there was ever anything said
22 about your arms other than there were cuts on your arms.

23 A. Okay. Here's --

24 Q. Did you make a verbal complaint about
25 your arm allegedly being broken?

1 A. Yes, ma'am. I complained to the staff
2 sergeant on the floors, especially in the 7th floor on
3 that lockdown, solitary confinement. I told that guy
4 every time when he came around. I told the nurse
5 every time they came around. I said hey, man, my
6 shoulder. When they said you fight downstairs, ain't
7 nobody trying to listen to you. They're just going to
8 lock you down. As soon as you get out of here, you go
9 to the doctor. And that's what I did.

10 As soon as -- as soon as that fight is
11 initiated, they don't care how bad you're hurt.
12 You're going in the hole. We'll deal with that after
13 you get out of the hole. And I've never seen Enzell
14 Woods before. I don't even know that guy. Never seen
15 him one day in my life.

16 Q. So when you went to Grady on 5/18/2016
17 for complaints of shoulder pain and a toe during an
18 altercation in the jail, there's no indication -- and I
19 haven't seen the records. There's no indication they
20 said your arm was broken or your toe?

21 A. It's not -- what they told me was --

22 Q. I'm not asking what they told you. I
23 need you to point me where in your records -- because
24 that's significant -- you had a broken arm and a broken
25 toe. That would be in your medical records May 18th of

1 2016. So where is that reflected in the records. Can
2 you point that out to Mr. Loegel so he can pull that up
3 for me, please?

4 MR. FILIPOVITS: He does not -- Ashley,
5 he does not have the medical records in front of him.

6 MS. PALMER: Okay. Mr. Filipovits, can
7 you point in the records where his arm was broken and
8 his toe.

9 A. It does not say arm. It's shoulder
10 separation is what it was. It's not a broken arm.
11 It's a separation of the shoulder. It's never a
12 broken arm at all. They didn't break my arm. It's a
13 separation of the shoulder.

14 Q. Well, you testified throughout this that
15 your arm was broken. You used the word fractured,
16 broken.

17 A. Fractured, separated. You can -- when
18 we get to court, you'll see it because it's never
19 been --

20 Q. On what page does it say the shoulder was
21 separated?

22 A. It's never --

23 Q. Can you refer me to that?

24 A. It's never been --

25 Q. Stop talking for a second, Mr. Robinson.

1 MS. PALMER: Can you refer me to that,
2 Mr. Filipovits, where his arm was separated?

3 MR. FILIPOVITS: Give me a moment here.
4 I mean the records are going to speak for themselves.
5 If I say --

6 MS. PALMER: Okay. I didn't have the
7 records beforehand, Jeff, and I have a right to question
8 him about this. If it says separated, I want to see
9 that.

10 MR. FILIPOVITS: You're asking me
11 specifically whether these medical records indicate that
12 his shoulder was separated?

13 MS. PALMER: That's correct.

14 MR. FILIPOVITS: And you're asking about
15 the date of which visit? I may need to take a break so
16 that you have a chance to review that.

17 MS. PALMER: Let's do that. Let's do
18 that. Let's take a ten minute break and I'm going to go
19 through the records.

20 MR. FILIPOVITS: I don't want you to rely
21 on me.

22 MS. PALMER: I agree. That's probably
23 true. No offense against you but -- all right.

24 (Brief recess.)

25 Q. (BY MS. PALMER:) So Mr. Robinson, just

1 to go circle back around to a couple of things, I'm
2 going to have Mr. Loegel read what we found on the Grady
3 report in just a second because he had it in front of
4 me. Trying to switch between different devices and it's
5 difficult. So you stated after the incident with the
6 deputies that your concern was your shoulder and your
7 teeth. Is that correct?

8 A. Yes, ma'am.

9 Q. Okay. So at no point did you express at
10 that point anything about a toe. Is that correct?

11 A. Ma'am, I was -- I was pointing out the
12 most painful things. I did -- I did point out my toe.
13 I did show him my toe. I remember sitting on the desk
14 and pointing down at my toe and telling him it didn't
15 look right because it was purple.

16 Q. Who did you point your toe out to?

17 A. It was -- it was a lady in medical. It
18 was a lady in medical. Then when I went to the
19 lockdown floor, I also showed it to the lady that was
20 coming by giving me my medicine, and then every time
21 at dinner, I would point it out. I would point out
22 all of my injuries.

23 Q. So the toe you pointed out to a lady in
24 medical after the Enzell Woods incident or after the
25 deputy incident?

1 A. I didn't -- I didn't get seen -- I
2 didn't get seen --

3 Q. So you pointed out the toe after the
4 deputy incident or the Enzell Woods incident?

5 A. I believe it was -- I believe it was
6 the deputy, the deputy. It had to be. Sat me on the
7 desk.

8 Q. When you were seen by Ronald Sanders?

9 A. I'm not aware of whoever I was seen by.
10 I don't recall his name but --

11 Q. So when you were seen at nine a.m.,
12 that's when you pointed out the toe?

13 A. Yeah, I pointed out the toe. I made
14 sure --

15 Q. You were seen at nine a.m. Is that when
16 you pointed out the toe?

17 A. I pointed out the toe in medical. I
18 don't know what time -- I don't know what time it was.
19 We're not privileged to time.

20 Q. Had the Enzell Woods incident happened?

21 A. Possibly. I don't -- I don't know what
22 time that you're talking about. All I can tell you --

23 Q. I'm not talking about time now. I'm
24 talking about had Enzell Woods happened? Time is
25 irrelevant at this point because you acknowledge you

1 don't know what time it was. So had the Enzell Woods
2 incident happened when you pointed out the toe?

3 A. It could have been -- it could have
4 been with the deputy. I don't -- I don't know because
5 they're both the same time period.

6 Q. They were not the same time period, sir.
7 One happened at seven o'clock in the morning and one
8 happened at 2:50, almost three o'clock in the afternoon.
9 So no, they were not the same time period. (Technical
10 difficulty).

11 A. That was -- it was after the sheriff's
12 deputy -- after the sheriff's deputy when I was going
13 up to medical, I showed everybody my injuries and I'm
14 pointing to my injuries. I pointed out all my
15 injuries to everyone and I said, hey, that don't look
16 right. This ain't right. It hurts every time I lift
17 it. My teeth. I pointed everything out to everybody.
18 Everybody who I could speak to about it, I spoke to
19 them about it.

20 Q. So you spoke about the toe incident right
21 after the deputy incident?

22 A. I do believe so.

23 Q. Okay. And that should be reflected in
24 your medical records that you mentioned something about
25 a toe?

1 A. I don't -- I don't -- I didn't -- I
2 didn't -- I wasn't -- I don't have the medical
3 records.

4 Q. I'm not asking if you have them. I'm
5 saying you mention --

6 A. It should be in the medical records
7 where I pointed out about my toe. It should be.

8 Q. Okay.

9 A. Because it was purple. I couldn't move
10 it so it should be somewhere in there.

11 Q. Okay. All right. I'm going to have
12 somebody check to see when that was.

13 MS. PALMER: Going back to the Grady
14 records, Mr. Loegel, could do you unmute yourself and
15 read what was found in the Grady records? And then we
16 will have a discussion about it on the other side,
17 Mr. Robinson.

18 MR. LOEGEL: This is Jonathan Loegel. It
19 is on page 88 -- the documents as defined on page 24 of
20 84. Page 80. The material provided to us today. It is
21 the medical record. It is dated at the top 5/18/16,
22 0733 which appears to indicate time.

23 Middle of the page, it indicates bones
24 and joints, colon, no acute fracture. Well-defined
25 lucency in the left scapula is concerning for possible

1 metastatic lesion versus multiple myeloma. Good
2 alignment of the glenohumeral and acro clavicular
3 joints. Soft tissues. No focal abnormality. That's
4 the end of the part I'm quoting.

5 MS. PALMER: Thank you, Mr. Loegel.

6 Q. Do you recall any of that being stated
7 out loud to you?

8 A. I don't -- I don't know the
9 terminologies of what they're saying so I can't -- I
10 can't really recall that. I don't --

11 Q. Do you know what myeloma is?

12 A. Yeah. My mother died of multiple
13 myeloma. That's -- that's bone.

14 Q. Right. So it sounds as if they had some
15 concern about possible tumor in your bone?

16 A. No, that's, that's, that's the actual
17 bone that's sticking up. That's the injury. It
18 should have been level there. That's the bone that
19 they speak of.

20 Q. Okay.

21 MR. FILIPOVITS: I'd like to state an
22 objection to, you know, witness's qualifications to talk
23 about his medical diagnosis, but with that objection
24 obviously --

25 MS. PALMER: Understood. Understood.

1 Q. So the bone was sticking up from --

2 A. That's what they're talking about in
3 that report. The bone was sticking up.

4 Q. Okay. Did you hear anything about a
5 separation or a fracture?

6 A. Separation or a fracture?

7 Q. In fact, I think the exact terminology
8 was not acute fracture.

9 A. Not acute fracture? I know but the
10 bone is sticking up. It's --

11 Q. I hear -- I hear what you're saying.

12 A. Okay.

13 Q. My question to you is did anyone either
14 in these medical records once you received them or
15 verbally say to you that there was a separation in your
16 bone?

17 A. At the hospital, I heard it, but in
18 those papers, I've never seen the papers so I can't
19 say yes or no because I haven't seen what you're --

20 Q. What individual at the hospital used the
21 word separation?

22 A. When I went to the hospital, like a
23 couple of times after that incident. I think I went a
24 few days after that also. It was one of the ladies.

25 Q. Correct. You did. You went on May 19th,

1 and in those records, you indicated you had slipped and
2 fell --

3 A. No, no, I didn't.

4 Q. -- and that's why your toe was injured?

5 A. No, nobody said that.

6 Q. So if that's in the medical records,
7 you're saying they're lying?

8 A. That's a lie.

9 Q. That's in the medical records.

10 A. That's a lie. I don't know where you
11 got that from. No slip and falls or nothing.

12 MS. PALMER: Mr. Loegel, can you pull
13 up May 19th date where it talks about the slip and
14 fall and read that to Mr. Robinson?

15 THE DEPONENT: Slip and --

16 MR. LOEGEL: Certainly. You mind
17 holding on for one moment?

18 THE DEPONENT: Slip and fall. Man,
19 come on. No. Where did that happen?

20 MR. LOEGEL: It may be best to take
21 another quick break while I find this reference.

22 MS. JOINER: This is Amelia Joiner.
23 It's on page 30.

24 MR. LOEGEL: Can we go off the record
25 for a second?

1 MS. PALMER: Yes.

2 (Off-the-record discussion.)

3 Q. So when we were off the record, there was
4 some information that was read to Mr. Robinson and
5 everyone on the video deposition from some records
6 concerning Mr. Robinson. Previously he stated he didn't
7 say anything about a slip and fall but I think he wants
8 to correct that now?

9 A. Yeah. What she's talking about is same
10 thing that's going on right now. I fall down when I
11 walk. Sometimes the hip pops out of place and it
12 makes me fall. I can't -- I can't do what I used to
13 do like walk down the street and things like that.

14 When I went to that hospital, I was
15 falling down and I was dizzy. I kept getting dizzy
16 and I was falling down. I never said that the
17 shoulder came from falling down. I was going to the
18 hospital because I was dizzy and I couldn't walk.

19 I mean I was scared. I remember that
20 day. I had to -- I had an ambulance up there because
21 I couldn't walk up there. That's what they're talking
22 about on the slip and fall. I was falling down after
23 the incident. I couldn't -- I couldn't walk.

24 They gave me the MRI's and they said,
25 hey, whatever it is that's going on should have been

1 taken care of at that time. Everything is healing up.
2 You need to take care of yourself. Bedrest. More
3 Percocet, more Percocet. I remember she gave me
4 another prescription of Percocet on that 19th because
5 I couldn't -- I couldn't do anything for myself.

6 I couldn't even -- it was worse than
7 fall. Like if I crawled, if I was trying to crawl, I
8 would fall down. That's what that is. That is -- no,
9 unh-unh, unh-unh. No.

10 Q. You indicated when you had the incident
11 with Enzell Woods that you all were tased but you said
12 it was ineffective. What did you mean by that?

13 A. Well, it didn't -- the handheld taser
14 that I was getting shocked with downstairs was
15 skin-to-skin contact where they contact with you.
16 With that gun, when they shot it, it didn't pierce my
17 skin or anything like that. It didn't -- it didn't
18 lodge at all. Neither one of us. It didn't lodge in
19 neither one of us because I was in front of him and
20 they shot me and it didn't lodge in my skin.

21 Q. You also indicated earlier during the
22 incident with the deputies that you were naked. Why
23 were you naked?

24 A. Talking about when clothes -- because
25 my hands were shackled and my feet were shackled and

1 it was a zip up type of thing where you button it up
2 and I couldn't -- I couldn't button it up because my
3 hands were behind my back. So it was basically open
4 from here all the way down and hanging. Like, you
5 know, like you're supposed to button it up. Well, I
6 couldn't button it up and, you know, you're nude --
7 you're nude at the waist down because it's a button up
8 so I couldn't --

9 Q. Are you talking about the jail
10 jumpsuit --

11 A. Yeah.

12 Q. -- when you say "it"?

13 A. Yeah.

14 Q. Okay. Why was it unbuttoned in the first
15 place?

16 A. I never buttoned it up. That was
17 coming from the shower. It wasn't buttoned. I never
18 buttoned it. I remember going out and then I wake up
19 in there and it's half on, like half on. I couldn't
20 button it up. I didn't -- I was nude.

21 Q. How long had you been in possession of
22 this jail jumpsuit before the incident? Who gave you
23 the jail jumpsuit?

24 A. The three deputies that -- in the
25 shower. So from the shower --

1 Q. So they dressed you. The three that beat
2 you up, they dressed you?

3 A. When I was getting dressed, he would
4 take the handcuffs off but leave the feet shackled.
5 So I put my arms in and then he handcuffed me. That
6 way, I'm handcuffed and shackles again and then he
7 took over the legs and I got my legs in.

8 Q. I'm just trying to get a clear
9 understanding of when did you initially get this
10 jumpsuit, why was it unbuttoned, and why were you naked
11 from the -- nude from the waist down.

12 A. I didn't --

13 Q. That's what I'm trying to understand. At
14 what point -- let's start with this question. At what
15 point were you assigned the jumpsuit?

16 A. After they drug me into the shower.

17 Q. So what were you wearing before that?

18 A. Regular clothes. The shirt -- you see
19 me when I don't have a shirt on. That was ripped off
20 of me. That was ripped off of me and I just had on a
21 regular pair of pants. I didn't have on a shirt when
22 we went into the shower. I was getting dressed out in
23 the shower.

24 Q. So the three men who beat you up then put
25 clothes on you?

1 A. While he was beating me and he was
2 tasing me, he threw the uniform. Put it on. I'm
3 putting it on. As soon as I put on the top, he had
4 cuffed the top still slapping and punching and then
5 take off the bottom. So once I got my bottom in,
6 that's when I was out. I'm out after that point.

7 And when I wake up, I'm back in the
8 intake area face down, hands behind my back and
9 shackled and that's when Frank Jones comes in and
10 tases me in my back when I'm face down, face down, out
11 of it. He comes in and he brings me back to life with
12 that taser.

13 Q. So when -- before you got drug, you were
14 in plain clothes?

15 A. Yes.

16 Q. Because you were in the clothes you were
17 in when you got brought over from court?

18 A. Yes.

19 Q. And was there ever any issue with you
20 being asked to put your jumpsuit on and you refusing to
21 do it?

22 A. Never. Never. I've been to that
23 facility more than one time, and in order for you to
24 even go to medical, you have to be dressed out. So,
25 you know, I was like let's go to medical. Got to get

1 dressed out. They're not going to let nobody up to
2 medical with plain clothes on so there was never an
3 issue about dressing out at all. That helped me get
4 to medical. I was looking forward to getting dressed
5 out and going to medical.

6 Q. So when they first encountered you, that
7 had nothing to do with dressed out with three deputies?

8 A. Nothing at all. When that person
9 counted me, I pulled away from the sergeant and then I
10 wake up being drug. As soon as I pulled away from the
11 sergeant in pain, I wake up being drug back to that
12 shower.

13 Q. And what was the sergeant trying to force
14 you to do, if anything?

15 A. I don't know. He just -- he just
16 grabbed me. I didn't hear anything. I just know he
17 grabbed me and it was like, awe, like wow, like no.

18 Q. So the sergeant just grabbed you and
19 didn't explain why he was grabbing you?

20 A. As soon as he grabbed me, I pulled
21 away, and when I pulled away, it was the incident.

22 Q. So he just walked up on you and grabbed
23 you, the sergeant?

24 A. He probably -- look, it was shift
25 change. It was shift change. He probably --

1 Q. Okay.

2 A. -- was telling me do something or
3 something or go sit back down but I was under the
4 impression that the guy that was at that desk I showed
5 the bulge in the shoulder, I'm like, hey, man, this is
6 the bone sticking out. I thought he was taking me to
7 medical. I thought he was taking me to medical so --

8 Q. So the sergeant had given you the
9 instruction, you believe, and you were defying it
10 because you said you were going to medical?

11 A. No. There was no instruction ever
12 given to me. I thought I was going to medical.

13 Q. So what did the sergeant do? You said he
14 didn't just walk up and --

15 A. He walked up on me --

16 Q. Don't interrupt. Mr. Robinson, let me
17 finish my question. So he walked up on you and you just
18 said he probably was telling you to say something or to
19 do something?

20 A. He was probably telling me --

21 Q. Was he telling to you do something or
22 not?

23 A. No, I didn't hear anything come out of
24 his mouth. All I know is he grabbed me and I was in
25 pain and I pulled back. Whatever he was saying, I did

1 not hear anything that he was saying. The only thing
2 I remember is pulling away, like, oh, like pulling
3 away.

4 Q. How do you know he was saying something?
5 If you didn't hear anything, how do you know --

6 A. He was -- he was close in personal
7 space. He was like close, like close. He had to be
8 trying to say something.

9 Q. Well, was his mouth moving?

10 A. I don't know. I was looking straight
11 ahead. I was looking straight ahead and I felt an arm
12 touch me and I pulled away, and when I pulled away,
13 the ordeal began. The ordeal began. I don't -- I
14 didn't see the guys touch me. I didn't -- I didn't --
15 I didn't feel going into handcuffs. I did not feel
16 going in shackles.

17 What I remember is waking up being drug
18 by my feet by the shackles to that area. It wasn't no
19 cuss, cuss, argue, argue. It wasn't no run away, run
20 away. It wasn't none of that. It was just woke up,
21 you drug. And I woke up, like, in a fit of rage
22 because the shackles were cutting into my ankles.
23 That's a slave drag. Ain't no slaves around here and
24 he did me like a slave.

25 Q. When you testified earlier that you

1 thought you had seen Fuqua at your probation
2 officer's -- with your probation office, when would that
3 have been?

4 A. That was in the hallway getting on the
5 elevator after I asked for the revocation. That was
6 the last time when I went to the probation office. I
7 came out of the office and there's the hallway where
8 the elevators sit. I walked past Fuqua. Fuqua was on
9 the left-hand side. I looked at him. I'm not in
10 violation of no law. He can't tell me anything and I
11 jumped on the elevator. I didn't tell him that. When
12 I see him, I'm like I'm not in violation of no law. I
13 have nothing to be afraid of asking for a revocation.

14 Q. Why did you assume that? Did he say
15 something to you?

16 A. Unh-unh. He just gave me that look
17 but --

18 Q. What kind of look?

19 A. Just a look. Just a look. He gave me
20 that -- just a look. He looked at me.

21 Q. Like a look like he didn't like you?

22 A. Yeah, like a menacing like type of a
23 look. He just gave a look.

24 Q. So why would he do that? Had y'all had
25 some prior issues or something?

1 A. No, no. There was -- there was -- all
2 the times when I went down to that probation office,
3 never was there an officer present at all. I have
4 never seen him there before. I have never come in
5 contact with that man. Nothing at all. Then when I
6 got down to the jailhouse, it was something waiting.

7 Q. He was what?

8 A. I guess they were waiting because in
9 order for you to swap name tags --

10 Q. Let me understand. The last time you
11 went to your probation officer before you got locked up
12 in May 2016, you made a request for a revocation because
13 it was interfering with your life, all the reporting.
14 Is that correct?

15 A. Yes. And the fact that when -- when I
16 asked my probation officer certain things, she was not
17 for me. She seemed like she was more against me.

18 Q. Okay. I understand.

19 A. So I asked -- I went to her supervisor.
20 I was like I need another probation officer because
21 this one, me and her, we're not seeing eye to eye, all
22 right.

23 Q. And so when you were in her building at
24 the probation office, that's when you walked out of her
25 office or wherever she sits, a cube or whatever, and you

1 walk out and you saw Fuqua there?

2 A. Fuqua was not in the probation office.
3 He was outside of the probation office in the hallway.
4 He never -- I never seen him inside.

5 Q. Did he have his uniform on?

6 A. Yeah, he had on the sheriff's -- the
7 whole sheriff's uniform, the uniform. It wasn't -- it
8 wasn't no name tag. He had on the uniform.

9 Q. And is the probation office located in
10 the courthouse?

11 A. That's on -- no, it's not the
12 courthouse. That's on -- it's on Peachtree next to
13 the park, across the street from the park by the
14 Coca-Cola building. Right down there by that
15 Coca-Cola building down there.

16 Q. Okay. And what date would this have been
17 on?

18 A. When I asked for the revocation, they
19 set it I think it was a week after. So it was
20 sometime in April because it happened in May. So it
21 was sometime in April, late April where I asked for
22 the revocation and just go do the jail time and that
23 was --

24 Q. So your testimony is you saw this Fulton
25 County sheriff's deputy just randomly in the probation

1 office?

2 A. Yep, and had never been there before at
3 all.

4 Q. And what was he doing?

5 A. Just standing by that door.

6 Q. Was he working like an off-duty job?

7 A. Unh-unh, unh-unh, no.

8 Q. How do you know that? I mean was he
9 reporting to probation? What was he doing?

10 A. He was just standing at the entrance
11 door of the probation office just standing there.

12 Q. Would they typically have officers
13 standing at the entrance --

14 A. No.

15 Q. -- of the probation office?

16 A. Never. Never ever, ever.

17 Q. So when you walked out, what did he do?

18 A. He just looked, just gave me the look.

19 I gave him the look and I just kept on going. We
20 didn't say a word to each other. None of that. He
21 just gave me the look and I gave him a look.

22 Q. Did he continue to stand -- did he
23 continue to stand at the probation office? Did he
24 continue to stand at the door after you left?

25 A. Yes. When I got on the elevator, he

1 was still at that door.

2 Q. Is the probation office in Park Place?
3 Is that where it is?

4 A. Yes, ma'am.

5 Q. Okay. So is that why you believe he then
6 gave his taser and his name tag to somebody, because he
7 saw you on a random April --

8 A. Yes, ma'am.

9 Q. -- at the probation office?

10 A. Yes, ma'am.

11 Q. And y'all had no words?

12 A. Never. We -- never had no words with
13 this man in my life. Never seen him. I couldn't even
14 pronounce his name when Markennis Jackson was making
15 the jokes because I asked Markennis Jackson how do you
16 pronounce that. He's like, oh, you too ignorant. You
17 can't pronounce nothing. Should have went to school.
18 I was like, oh, I got school for you, uh-huh.

19 Q. Well, how did he know that you had
20 happened to be booked in the jail that day?

21 A. I mean because the revocation, when you
22 revoke, they know, they know -- your probation
23 officer know what time you're going to jail.
24 Everybody know what time you're going down there.

25 Q. No, I'm not asking about your probation

1 officer. I'm asking how did Fuqua who is not your
2 probation officer --

3 A. How did Fuqua know? I have no idea.
4 He works at the jailhouse. I have no idea. I have
5 no --

6 Q. So you're telling me from a month before
7 Fuqua was checking records to see when you got booked in
8 so he could give somebody his name tag and taser?

9 A. It wasn't -- it wasn't a month before.
10 The revocation --

11 Q. You said it was April.

12 A. It was April but it happened in May,
13 May 1st -- excuse me -- May 2nd, May 3rd.

14 Q. Okay.

15 A. Seven days before May 3rd would be
16 April 23rd or 24th. So at the end of April, that's
17 when -- that's when I catch him in the hallway. I go
18 for my revocation. And in the court, I was going to
19 address the probation officer and the judge at the
20 same time but the probation officer was not there at
21 all because I wanted to really talk to the judge about
22 her attitude and her demeanor. She was not there.
23 Then I went to the jailhouse. When I went to the
24 jailhouse, they were waiting.

25 Q. Right. But my question is this. So

1 Fuqua from seven days before, you believe he had been
2 waiting to see when you would get booked into the jail
3 so he could switch name tags and taser to get you?

4 A. That's -- that's what I believe.

5 Q. Why? Why would he do that? Just because
6 you gave each other a look at probation?

7 A. Maybe, maybe because he may know the
8 probation --

9 Q. I'm not asking maybe. What happened
10 between y'all other than you looking at him and him
11 looking at you?

12 A. The only person I had words with is
13 Valerie Sims. Maybe he knows Valerie Mims. That's
14 all -- that's the only thing I could think of. Like,
15 he has to know Valerie Mims. He was at the office.
16 Name tags got swapped. It had to be me arguing with
17 this probation lady. That's the only thing that I --
18 that's the only person what I had an altercation with
19 before this to happen.

20 I've been to that facility before and
21 I've never gotten into any fights with the inmates.
22 I've never gotten into any altercations with staff. I
23 just do my little days and go home. I have never been
24 combative inside any institution.

25 Q. How do you spell -- how do you spell

1 miss -- your probation officer's last name?

2 A. M-i-m-s. Her first name is not the one
3 that's listed on the court proceedings because I
4 think it had --

5 Q. I want the Valerie lady that you think
6 you had --

7 A. Valerie Mims. I have her name as
8 Valerie but it starts with a V. It's V. Mims. If
9 it's not Valerie, it's someone else but --

10 Q. Spell her last name.

11 A. Veronica Mims or Valerie Mims.
12 M-i-m-s.

13 Q. Spell her last name.

14 A. M-i-m-s.

15 Q. So you believe that because you and Ms.
16 Mims had words, she and Fuqua had a relationship. He
17 then a week later switched his name tag and taser to get
18 you back for the words you had with Ms. Mims?

19 A. That's what I believe to be the story.

20 Q. And you don't have any evidence to prove
21 these two even know each other other than the fact that
22 you believe he was present there at the probation
23 office?

24 A. I can't speak on anybody's relationship
25 but they had some type of connection. That's the only

1 way --

2 Q. How do you -- how do you -- that is you
3 speaking on somebody's relationship then. What kind of
4 connection?

5 A. Probably professional. Probation
6 officers and -- probation officers and sheriff's
7 deputies, they all work in the same network. I'm
8 pretty sure they know each other. More than positive
9 they know each other.

10 Q. And so describe what Fuqua was wearing
11 again on this date and what time it was.

12 A. He was dressed in the sheriff's
13 deputy's uniform, you know, with the tie and all that.
14 You know, he had his uniform on.

15 Q. What do you mean the tie?

16 A. Huh?

17 Q. What do you mean the tie?

18 A. You know, the brown -- the brown
19 uniform, the sheriff's deputy uniform that they wear.
20 The brown uniform. That's the uniform.

21 Q. And it had his name on it, emblazoned on
22 it?

23 A. Yes.

24 Q. And you saw it and it said Fuqua?

25 A. Yes. It -- he had on -- I mean he had

1 on the whole uniform, the light brown with the black
2 brown.

3 Q. Okay. And what did Fuqua look like? Can
4 you describe him for me?

5 A. Brown skin, short haircut, clean
6 shaven.

7 Q. How tall?

8 A. Maybe five -- five nine. Maybe five --

9 Q. What weight?

10 A. 180. Between 170 and 180.

11 Q. And what time would this have been?

12 A. Like I say, they don't really keep the
13 time frames in that probation office and it wasn't on
14 time. I tell you that.

15 Q. What time were you supposed to report
16 that day?

17 A. I think it was maybe ten or eleven. So
18 it had to be between one and -- well, 12:30 and three.
19 Between 12:30 and three. Somewhere between that time
20 frame.

21 Q. Do you recall going in front of Judge
22 Schwall prior to January 2017 date when we were reading
23 through the transcript?

24 A. Yeah, I remember Judge Schwall.

25 Q. And do you recall that previous time you

1 all were in court that Jones was there as well?

2 A. Yes.

3 Q. And what is it that you said to the judge
4 then in reference to Jones?

5 A. That --

6 Q. Because it doesn't appear that you
7 accused Jones that prior time.

8 A. Well, what I asked for was -- how it
9 played out, Fuqua was here. Jones walked in. And I
10 said, Your Honor, we have two Fuquas in the house now
11 because I know I got him in the court. I said we've
12 got two Fuquas in the house. I said and this Fuqua
13 says that he was not there but I know this Fuqua here
14 and this is also Fuqua. I didn't know -- I didn't
15 know his name was Jones or Saunders or Jackson. I
16 wasn't aware of anyone's names.

17 I asked the judge, I said, Your Honor,
18 now here's the dilemma. There's -- on that video, you
19 see three people on that video but they're saying that
20 it's four. Technically there's three people on that
21 video but the reason why Fuqua is here is because they
22 swapped name tags. They're lying.

23 I need one, two, three. I need his
24 name, birth, address. I need all of them because they
25 are part of this investigation. Give me their names

1 and their date of births so I can put a civil warrant
2 on them. And the judge, give him what he need and --

3 Q. No. That happened in January. The only
4 people who were present in January were you and Fuqua.
5 There was a prior --

6 A. Yeah.

7 Q. -- court hearing where Jones was actually
8 present?

9 A. Yeah, yeah, the judge -- that's the --

10 Q. (Unintelligible).

11 A. That's the day the judge -- that's the
12 day the judge slammed the gavel when they all three
13 was present because -- I need all their names and I
14 thought they was going to be coming to the next trial
15 but I didn't -- I didn't subpoena them. So they
16 didn't pop up at the last trial. Just Fuqua came.

17 The judge -- the judge slammed the
18 gavel down when they all three are there and said give
19 me their names, date of births. Nobody gave me no
20 names or date of birth, nothing, nothing but the judge
21 ordered them to.

22 And that's when I found out after I got
23 in there -- I was like, oh, that's the guy right
24 there. I googled him. That's the guy. That's when I
25 figured it out. I'm like, oh, there he is. Fuqua.

1 Jones. Fuqua.

2 Q. What do you mean you googled him?

3 A. I googled -- I googled Frank Jones on
4 Facebook. I googled Rafferty Fuqua, Facebook. I
5 googled Saunders, Facebook, and Markennis Jackson,
6 Facebook. Pictures popped up and I saw that jaw.
7 Once I saw that jaw formation, I was like there's my
8 guy right there.

9 Q. Are you referring to Jones?

10 A. Yes.

11 Q. But you had seen Jones in court
12 previously. So why were you not -- why did you have to
13 go to Facebook to figure out if that was the right guy?

14 A. No. I went to -- I was on Facebook to
15 get their date of births because y'all did not turn
16 them over to me as the judge ordered. So I had to go
17 on Facebook and try to figure out when the date of
18 births was and get the personal information off of
19 Facebook.

20 Q. And their dates of birth were all on
21 Facebook?

22 A. Everything is on the internet.
23 Everybody's information is on the internet. You know,
24 people celebrate their birthday and like to post on
25 Facebook what they got on their birthday. So I used

1 that, figure out Rafferty Fuqua's date of birth and
2 where he reside and all that stuff. I was using the
3 Facebook as an investigative tool.

4 Q. Mr. Robinson, have you ever been
5 diagnosed with a mental health illness?

6 A. Yes.

7 Q. What mental health illness and when?

8 A. After my mother died, a depression.

9 Q. What year did your mother die?

10 A. Two thousand -- well, after my mother
11 and my father died because they died months apart.
12 That was 2014, 2014. Boy, that was the worst time in
13 my life. Extreme depression. You know how it is when
14 mama die -- when your mama die or your daddy die. Put
15 them both together. Extreme depression.

16 Q. In 2014, I have records that reflect you
17 were diagnosed with bipolar disorder. Is that
18 incorrect?

19 A. Yeah, yeah, because I snapped. I had
20 snapped. I had snapped. Yes, I would snap. If I got
21 angry at that time, I was feeling so many different
22 emotions like -- yeah, yeah. You'd be bipolar, too,
23 if your mother died. One day you'll feel happy. One
24 day you feel sad but they said that's a part of the
25 healing process is to be happy and then you be sad.

1 You think about one emotion and think about emotion.
2 That's natural.

3 So I was like, well, if it's mental --
4 it definitely because I lost my mother. Everybody
5 would be sad -- and happy and sad. And my father.
6 You would feel the same way, too.

7 Q. Did they give you any kind of medication
8 for the bipolar?

9 A. Yeah, but -- yeah, but it wasn't the
10 bipolar. I just needed to come to grips with what God
11 had put in front of me. No medicine can cure that.
12 You have to trust God and go on the path.

13 Q. So they did -- they did prescribe you
14 some medication and you just declined to take it?

15 A. No. I took it -- I took it until it
16 ran out, and after it ran out, they was like that's
17 not bipolar. That's depression, the up and down
18 because look what you're going through. That's
19 normal.

20 Q. (Inaudible). Mr. Robinson, did you hear
21 my question?

22 A. No, ma'am.

23 Q. How long did you take the medication?

24 A. Oh, about six, six months. About six
25 months. I took it for about six months. But even

1 after the six months, you know, you never get over the
2 loss of your parents. That's something you've just
3 got to deal with. No medicine can take that wound
4 out. You have to deal with it so I dealt with it.

5 Q. Mr. Robinson, I'm going to refer you to
6 the records that your attorney sent me and I'm sorry I
7 can't share them with you but I'm going to start with
8 plaintiff's Bates stamp number 00862. It's from the
9 transcript of the initial hearing that you had before
10 Judge Schwall. If you give me a second, I'll find that
11 date for you. The date on that is August the 5th of
12 2016.

13 I'm going to read to you what you
14 testified to during that hearing. "They dragged me from
15 intake by my feet in shackles to a back room. In the
16 back room, Mr. Fuqua punched me in my face, kicked me in
17 my face and tased me so many times I can't remember.
18 Tased me in my testicles, and the whole time, the other
19 guys are holding me down laughing like it's a joke."
20 Who was holding you down?

21 A. There was -- there was no holding me
22 down. It was --

23 Q. Then why did you say that to the judge?

24 A. That's their interpretation. When I
25 was in the shower --

1 Q. Wait a minute. Stop for a second. Stop.
2 So you're saying that the court reporter transcribed her
3 interpretation and not the exact words that you had said
4 in court?

5 A. Exactly. There was nobody -- there was
6 nobody in that shower --

7 Q. You never said -- you never said the
8 words they -- the whole time, the other guys are holding
9 me down laughing like it's a joke? So the court
10 reporter took that down incorrectly?

11 A. That's -- that's inaccurate. When --
12 when I was in the shower being assaulted by Jones
13 a/k/a Fuqua, Saunders and Jackson were in the other
14 part. They were not in the shower area. They were in
15 the other part laughing and joking. Nobody needed to
16 hold me down because I was handcuffed and shackled so
17 there was no need for anybody to hold me at all.

18 Q. How about the other (technical
19 difficulty).

20 (Court reporter interruption.)

21 Q. So from the shower area where the other
22 two gentlemen were standing, they could see what was
23 going on?

24 (Court reporter interruption.)

25 A. They were not present. No, they were

1 not present. It was just --

2 Q. They were not present?

3 A. No.

4 Q. Could they see what was going on?

5 A. No, ma'am. No, ma'am. It's separated
6 by a partition and there's a doorway. There's just
7 one single doorway. And I know for certain Saunders,
8 Saunders was out -- and Jackson both, they both were
9 out there. They were not in the same doorway corridor
10 as we was. They were in the adjoining room next to
11 it.

12 Q. Understood. The whole time Jones is
13 hitting and punching and kicking, they're in the
14 adjoining room unable to see what's going on?

15 A. They are in the adjoining room
16 laughing.

17 Q. And unable to see what's going on,
18 correct?

19 A. You can hear -- you can hear the
20 punches and the kicks. You can hear them. I mean
21 he's not -- he's not --

22 Q. How do you know what they could hear?

23 A. Before, before I got drug into the
24 shower, I was in the corridor between the shower and
25 the room where they're standing. That's when the

1 beating started. Half of my body was inside the
2 shower. My legs were in the shower. I'm face down
3 and I'm looking up. I see Saunders on the right
4 hand -- the left-hand side and Jackson on the
5 right-hand side.

6 And that's when Jones a/k/a Fuqua
7 started hitting and he started off with a slap first.
8 Then I commented he hits like a girl. And it turned
9 into a punch and that was in front of Saunders and
10 Jackson. That's when he gets behind me to my legs and
11 drags me completely into the shower where --

12 Q. I see.

13 A. So they saw. They saw him hit me in
14 the beginning, but after getting drug into the shower,
15 it was more of a joke. They was laughing and joking
16 when I was in the shower.

17 Q. So the court reporter incorrectly
18 transcribed that they were holding you down?

19 A. Yeah. No, I --

20 Q. Have you read this before? Did you go to
21 the court reporter and tell her she had messed up?

22 A. No, no. From the beginning, I
23 maintained Saunders never put his hand on me. He
24 never held me down. He never touched me. He never
25 did any of that. That man did not -- but he just --

1 he sat there as the bodyguard and he was laughing. If
2 I would have did something, Saunders would have beat
3 me if I had acted inappropriately.

4 Q. So let me continue. "So he takes the
5 handcuffs off of me and I'm like, oh, you are blase
6 blah. And I'm cussing at him. No lie. I'm like, oh,
7 you scared to fight and I'm like, man, you got two
8 deputies holding me down and then you running on here
9 talking about fighting me." So again she took that down
10 incorrectly?

11 A. When I said holding me down, that
12 was -- that was while I was handcuffed and shackled.
13 When you see me spin past that wall, all of them have
14 hands on me but they're -- it's not -- they're not
15 holding me down while he's on top of me hitting me,
16 no. No. They may have been holding me or keeping me
17 in place, but as far as holding me down and punching
18 me, no, they didn't do that.

19 Q. Okay.

20 A. They didn't -- they didn't -- no, no,
21 unh-unh. I wouldn't put that on them. Saunders and
22 Jackson did not hold me down while that guy sat on me
23 and beat me. No, not that type of hold. No indeed.

24 Q. And then you say, "anyway they dragged me
25 to the back talking about undress. Mr. Fuqua was

1 tasering me with a taser so many times I'm trying to
2 jump on it. He's tasing me in my testicles. Anyway
3 from there, he disappears and hits the punches. I see
4 my teeth fall out. I also see his foot retracting from
5 my face. I see his hand retracting from my face.

6 When my teeth falls out, I said, hey,
7 man, my teeth fell out. One of his buddies says, hey,
8 you need to get Fixodent and then drags me. From there,
9 I blacked out. They dragged me back. I'm pissing on
10 myself. While I'm handcuffed and shackled face down,
11 Mr. Fuqua says, oh, you're pretending and runs up behind
12 me while I'm handcuffed and shackled face down and tases
13 me again in my back to wake me up.

14 When I wake up, I'm pissing on myself.
15 I'm bleeding out the mouth. One of my teeth was gone.
16 Two of my teeth was loose. I'm spitting blood on the
17 window. I can't stand so I'm hitting the wall. I'm
18 like, oh, this is not Rice Street. I'm butt ass naked.
19 The suit is hanging off. It's not even zipped up." So
20 you did have teeth fall out of your mouth?

21 A. Like I said, a loose tooth or
22 whatever --

23 Q. No, no, no. I will read it to you again
24 but you said in here you had two teeth loose and one
25 tooth had fallen out. That's what this transcript says.

1 A. Yeah, yeah, one tooth had fallen out,
2 however you want to look at it. Yeah, the teeth were
3 gone. It was gone after that point. However you want
4 to word it, the teeth were --

5 Q. No, no, no. I'm not trying to word it
6 any way. Let's define what teeth fall out means. No
7 longer in your mouth, not attached in any way in your
8 mouth. So is that your testimony that teeth were no
9 longer in your mouth?

10 A. My testimony --

11 Q. (Unintelligible).

12 A. My testimony is the teeth were hanging
13 by the meat in my mouth. The meat was around the
14 teeth. It wasn't, like, pulled out. The meat was
15 around the tooth like it had been ripped out. That's
16 what I'm trying to explain to you. It's not like pop
17 out. The meat and the teeth. To get them out, I had
18 to pull the meat from my gums.

19 Q. So when you testified to the judge I see
20 my teeth fall out, you meant you saw your teeth hanging
21 by meat?

22 A. The gold teeth had fallen out. Bling,
23 bling, bling. Markennis Jackson, we got trophies.
24 That's what -- when my teeth fell out, bling, bling,
25 talking about the gold falling on the ground.

1 That's -- my gold teeth fell off.

2 Q. Was your gold tooth on top of a real
3 tooth?

4 A. Yeah. Yeah, they shave the teeth down
5 and they put glue around the teeth to keep it in place
6 and that's how they keep it in place. And, you know,
7 to make it look normal, they shave the teeth down. So
8 the teeth are shaved down and glue, gold.

9 Q. And how many of these golds did you have
10 in your mouth?

11 A. Four.

12 Q. All up in that area at the top --

13 A. Yes.

14 Q. -- where your teeth are missing? Those
15 were all gold teeth?

16 A. Yeah, they were all gold teeth.

17 Q. So when they put gold teeth in your
18 mouth -- and pardon my ignorance. I've never had gold
19 teeth. I don't know anybody that's had gold teeth.
20 Well, I do but I don't know the process. They shave
21 your real teeth down to put gold and glue them --

22 A. They did --

23 Q. Don't interrupt me.

24 A. All right.

25 Q. Let me finish. They shave your real

1 teeth down that you were born with to put gold teeth in
2 your mouth with glue. Is that what you're telling me?

3 A. Yes, ma'am. They file them down.

4 Q. How far down do they get filed?

5 A. Not that far. Maybe like a few
6 centimeters. Not filed down to little bitty posts.
7 Just a few centimeters. You couldn't even tell if you
8 take off the teeth. It's just so they fit, align with
9 the rest of your teeth so the gold don't bulge down
10 but it's not like a super file down. It's just a
11 minor file. Maybe a centimeter, two centimeters. Not
12 that much.

13 Q. So when your gold teeth came out, your
14 real teeth also came out?

15 A. Yeah. When the -- they hit the gold
16 teeth, they move. There was movement inside my mouth.
17 So every time the metal pushed against it or was
18 thrust against the teeth, it broke everything down
19 that was around. The file was gone. The gold was
20 gone. Everything was gone up until the root. Just
21 like roots.

22 Q. In 2018, do you recall visiting Grady and
23 being diagnosed with PTSD and depression?

24 A. Yes, ma'am. Yes, ma'am. I can talk
25 about the PTSD. When I went to the psychiatrist's

1 office about the issue, I had a lot of fears. I still
2 have a lot of it now where I don't really deal with a
3 lot of people but I was diagnosed with the PTSD from
4 the beating and she put me on some type of pill. I
5 forget what it was called. It's right on the tip of
6 my tongue but they medicated me to calm me down so I
7 can be in groups of people and not be fearful of this
8 or that and not be hypervigilant, just to sort of
9 relax. I forget the name of this pill that they put
10 me on. I have it -- I have it at home.

11 Q. This diagnosis was after you had been to
12 prison, right?

13 A. No. Yeah. Well, I got diagnosed in
14 prison. I went to the psychiatrist in prison and that
15 prompted me to go to seek mental health after prison.
16 So I went and sought the mental health after prison.
17 So yeah, yeah.

18 Q. What was your experience like in prison?
19 What prison were you in --

20 A. Well, I was in Coffee County. I spoke
21 to the warden about my issue and I wrote a statement
22 out to the warden to let the warden know exactly what
23 I went through, my experience, and the warden, black
24 guy, best warden in the whole world. I thank God for
25 that guy. He kept me sane. He let me clean the

1 bathrooms and all that stuff. He gave away gift
2 packs. He made -- he made prison -- I hate to say it
3 but he made it pleasurable to get away from all the
4 stuff that had happened.

5 He went -- he bent over backwards. He
6 even created a bingo day for me when I was there and
7 he started letting all the other prisoners come to
8 bingo. Coffee County correctional did a good job.
9 Nothing bad to say about them.

10 Q. Are you still on that medication?

11 A. No, ma'am. I don't take any
12 medications. I'm off of all that. I don't take any
13 Percocet. I don't take anything. The only way I'm
14 going to deal with it is to put it in God's hands.
15 Percocet don't work. None of that stuff don't work.
16 That pain is always going to be there. I have to pray
17 on it and I do that religiously.

18 Q. Let's talk about you going to the
19 district attorney's office to make a criminal report.
20 So we talked about the hearing before Judge Schwall. Do
21 you recall speaking with Deputy District Attorney Adam
22 Abbate?

23 A. That was a long time ago. Yes.

24 Q. Are you aware that Mr. Abbate has been
25 unable to move forward with your investigation in your

1 case because of your refusal to speak with him or other
2 members of his office?

3 A. Yes, ma'am. I, I, I declined on
4 speaking with them guys is because there's nothing
5 more that I can say. I've said this story a thousand
6 times the same way. They have all the information and
7 honestly I was -- I was afraid of retaliation from the
8 Fulton County sheriff's deputies because I initiated
9 the lawsuit.

10 So I wanted to stay away from all of
11 that negativity up until I got a chance to speak to
12 someone who I could trust about it and I just didn't
13 feel comfortable with speaking about none of them.
14 And it wasn't that what he said -- the exact words was
15 we're two separate departments, but I'm saying if it's
16 a conspiracy thing, who can I trust. If I tell you a
17 piece of information and the information gets back to
18 me, then I have an issue.

19 I had told -- I had told that district
20 attorney some information and it got back to me as a
21 threat from the streets. So I was like, oh, well, if
22 I can't tell the district attorney anything in
23 confidence, I can't trust him.

24 If I tell you something about a certain
25 person to investigate, you can't tell that to them and

1 then they tell that to the thugs and the thugs come
2 ask me about what I'm talking to y'all about. So
3 that's why I stopped messing with the district
4 attorney.

5 Q. Who threatened you in the street?

6 A. I have it on my phone. It's a guy.
7 It's a guy. He said something about, yeah, I heard
8 what you said, blase blah blah. Grand --

9 Q. Can you pull it up and read it to us?

10 THE DEPONENT: Miss Court Reporter, do
11 y'all have WiFi here?

12 THE COURT REPORTER: Yes. Pull that sign
13 around to you. There's a password. Do you see it?

14 A. Okay. All right. There we go. Come
15 on now. Go on to the next question while I pull it up
16 because my screen is cracked and it takes a minute for
17 me to type everything in here.

18 Q. Okay. So let's discuss your prior
19 incarcerations in the Fulton County Jail. During the
20 prior times that you were in the Fulton County Jail,
21 were you ever given an inmate handbook?

22 A. No.

23 Q. How many times have you been incarcerated
24 in Fulton County Jail?

25 A. Several.

1 Q. What is several? Can you give me an
2 estimate?

3 A. More than five.

4 Q. Okay. And in those five times or more,
5 you've never received an inmate handbook?

6 A. No, ma'am. Everything is automated.
7 It's on the wall. There's the kiosk on the wall.

8 Q. That's now. That's now but that wasn't
9 then. So you're saying --

10 A. You're saying --

11 Q. It is automated now.

12 A. You're talking about a printed copy of
13 it? No, we never -- they stopped -- they stopped
14 doing that. I asked them why we couldn't get one.
15 It's because they said it came with staples in them
16 and they made tattoos with the staples so they don't
17 give out inmate handbooks.

18 Q. When were you told that?

19 A. I remember asking about it one time. I
20 don't recall what year.

21 Q. But you were -- so you were aware an
22 inmate handbook existed?

23 A. Yes.

24 Q. According to you, you refused to -- they
25 refused to give you one because of the staples?

1 A. Yeah. They don't give out staples at
2 all inside those facilities because they make tattoo
3 guns with them. So there are no paperback -- there
4 haven't been paperbacks back there -- I've never seen
5 one at all but I heard of one but I never seen it.

6 Q. Okay. Are you familiar with the
7 grievance process at the jail?

8 A. Yes, ma'am. Now I am.

9 Q. What do you mean now you are?

10 A. That the last -- I put in a grievance.
11 I put in a grievance before about --

12 Q. When was that?

13 A. When I went to jail for the violation
14 for the -- the last one I went to prison for for the
15 nolo contendere. All right.

16 During that nolo contendere, I wrote a
17 grievance against Rafferty Fuqua in the sheriff's
18 department and my grievance was during this
19 investigation Rafferty Fuqua's wife, pink motor bike,
20 was following me around Atlanta, followed me to a gas
21 station. When I went to another spot, she was there.
22 She was asking me to buy the motor bike. My girl is
23 like, no, he's not buying the motor bike. He has to
24 get himself together. He can't get on a motor bike.

25 But I wrote a grievance about it

1 because I didn't know that that was Rafferty Fuqua's
2 wife at that time up until I Facebooked him and then I
3 see him hugged up with a girl on a pink motor bike. I
4 wrote a grievance about that.

5 Q. Okay. So what year was that?

6 A. That was in two thousand -- right when
7 I went to prison. The judge gave me county time but
8 they sent me to prison.

9 Q. I don't know when you went to prison. We
10 don't know each other.

11 A. 2018.

12 Q. What year was that?

13 A. 2018.

14 Q. Okay. And how did you become aware of
15 the grievance process in 2018?

16 A. I was told about it.

17 Q. By whom?

18 A. An inmate.

19 Q. So prior to 2018, in the five other times
20 you had been to the jail, you had no idea there was a
21 way that you could file a grievance?

22 A. No, I wasn't -- I wasn't aware that you
23 could file a grievance like -- no, no, not that I'm
24 aware of.

25 Q. So how do you think you made complaints

1 in the jail?

2 A. I thought you just write a complaint.
3 You write the complaint and put it in the box. I
4 didn't know you could address --

5 Q. That's what -- that's what a grievance
6 is.

7 A. But here's the thing.

8 Q. Uh-huh.

9 A. When I was on --

10 Q. Okay. So let me stop you. You're aware
11 there's a box and you can write it and put it in the
12 box. You were aware of that. How soon were you aware
13 that the box existed and you could write stuff and put
14 it in the box? When did you first become aware of that?

15 A. Well, when I wrote the grievance
16 against Fuqua, they wouldn't even let us put it in the
17 box. We slid it under the door and --

18 Q. That's the first time in all the times
19 you had been in the Fulton County Jail that you ever
20 became aware of a box?

21 A. That I can remember. Now the
22 difference between those times and that time is the
23 7th floor, that's the murder floor. There is no
24 grievance on that floor. You don't get no grievance
25 paper. I asked for it.

1 You don't get any documents. A
2 document pen, I asked for that. I asked for all this
3 to write this information down. I was refused a pen.
4 I was refused any form to write anything down. To
5 people that I spoke to, I need to write the names down
6 but they would not give me anything to write it down
7 with, no pen, no paper.

8 Q. Who are they? Who are they?

9 A. The commanding officer of the floor.

10 Q. What's the name?

11 A. No pen, no paper. I don't remember. I
12 don't remember but he came around to do the showers.
13 When they came around to do the showers, I need to
14 write blase blah. We don't allow pens in here.

15 I said, well, how are you supposed to
16 get a pen? Blase blah, blah, blah. Oh, you've got to
17 fill out an indigent. Well, I'm not there long enough
18 to be indigent and I doubt the killer next door is
19 going to give me his pen. They don't share pens in
20 that jailhouse. You have to have a super or something
21 to give to them to get an inmate from their pen and
22 then --

23 Q. So you were advised to request an
24 indigent kit which you didn't do and you were aware --

25 A. Fifteen days.

1 Q. Okay. Don't interrupt me. I'm still
2 asking my question. You were advised to request an
3 indigent kit to get a pen and you were aware that if you
4 had gotten to a pen you could have filled out the form
5 and put it in the box. Is that what you're saying?

6 A. No, ma'am. On that day, I was not
7 advised to get an indigent kit.

8 Q. Well, that's what you just said.

9 A. I said when I went to prison on that
10 last time --

11 Q. I'm not --

12 A. Hold up. When I went -- listen.
13 Listen.

14 Q. I just want you to tell me about the
15 Fulton County Jail. Prison is irrelevant to me. When
16 you -- all the times you were in the Fulton County Jail,
17 your testimony is you were unaware that there was a box
18 that you put the forms in for the grievance. Is that
19 what your testimony is?

20 A. My testimony is on that day in
21 question --

22 Q. I'm not asking about --

23 A. -- there was no -- there was no --
24 there was no box on the 17th -- on the 7th floor.
25 There is no box where you can do an indigent --

1 Q. I'm not asking about that in the
2 question. I'm asking about your knowledge of the
3 grievance process at the Fulton County Jail. So please
4 explain to me your knowledge of the grievance process
5 which as you have already articulated involved writing
6 on a piece of paper and putting it in a box. Explain to
7 me how you came about to that knowledge and when you
8 did.

9 A. I came to that knowledge after the fact
10 when I got arrested and I went to prison and I wrote
11 the grievance paper. That's when I wrote a grievance.
12 At that point, I became aware of the grievance system
13 to write it down. That's after the effect. That's
14 after the point.

15 When I got beat up in Rice Street,
16 there was the 7th floor and there was the door. They
17 slid the door thing open, looked in there, put the
18 food in and slid it back. There is no here's a pen.
19 Here's a grievance. No, no. There is no commissary
20 because you don't get commissary up there, especially
21 on the fight charge. All that is revoked. You don't
22 get --

23 Q. Okay. You're not understanding my
24 question, Mr. Robinson. I understand that you're saying
25 you had inability. I'm asking about the grievance

1 process.

2 A. That's in 2018.

3 Q. Okay. You were in prison -- I mean you
4 were in Fulton County Jail in 2011. You were in the
5 Fulton County Jail on 2014. According to you, at least
6 five times, maybe more. And in all of those times,
7 you're telling me that you never knew there was a
8 grievance process?

9 A. No, ma'am, not that I'm aware of.

10 Q. I don't know what that means, not that
11 I'm aware of.

12 A. I was not aware of a grievance system.
13 I was not aware of any kind of way where I could
14 reciprocate an action. I was not aware of that. I
15 was not aware. I've never been through a situation
16 where I've been jumped on by an officer before.

17 Q. I said nothing about being jumped on.
18 You keep trying to myopically focus on that. I'm
19 talking about globally. You're saying all the times you
20 have been in the Fulton County Jail -- you're familiar
21 with shift change. You're familiar with people's
22 titles, stuff that people typically aren't familiar with
23 unless they've been to jail a lot of times. And I'm not
24 trying to disparage you. I'm just saying that's the
25 case. And you're telling me that in all those times you

1 had no knowledge that there was a grievance process by
2 which you could avail yourself of?

3 A. No, ma'am. I was not -- I was not
4 aware that I could put a grievance against anybody
5 and --

6 Q. (Unintelligible)

7 A. Hold up. Hold up. And to make matters
8 worse, they were not giving the grievances out when I
9 was on the 7th floor. It was impossible --

10 Q. How do you know that?

11 A. I asked for a pen. I asked for a pen.
12 I asked for a piece of paper. I asked for something
13 to document and I was refused.

14 Q. Okay. I'm not asking about refusal for
15 paper and pen. I'm asking how do you know they weren't
16 giving out grievances? Did you --

17 A. I asked. They didn't give anything.
18 They didn't -- I said, man, how do I put this in black
19 and white. They didn't give me anything. They didn't
20 give me anything. Nothing. Nothing at all.

21 Q. So before 2016 if you had a complaint at
22 the jail, how did you make your complaints?

23 A. I never had any complaints. I was
24 never -- I was never combative. I never got into
25 anything at that jailhouse. I never got in no

1 trouble. Nothing, nothing. I've never had a use for
2 the system at all.

3 Q. So who told you about the box and that's
4 where you put the form in because you say it happened
5 when you went to prison. I don't understand how it's
6 helping us when you were in prison. I'm talking about
7 the jail. How did you find out about the box in the
8 jail?

9 A. When I was in jail, that's when I wrote
10 the grievance. I didn't write the grievance in
11 prison. The prison was -- they did right by me in
12 prison. Inside that --

13 Q. Where did you get the grievance form from
14 in 2018?

15 A. I believe my roommate had one under his
16 bed. The roommate -- the guards never walked around
17 with them at all. You had to get them from another
18 inmate and I got it from an inmate.

19 Q. How did that inmate get it if the guard
20 never gave anybody one?

21 A. I don't know. I don't know how he -- I
22 don't know. Why don't you ask --

23 Q. How did the inmate get it?

24 A. Grievances don't come on a copy
25 machine. The grievances, they come in like a three

1 pack and you'll write on them and it has a copy of a
2 copy of a copy.

3 Q. Okay.

4 A. That -- my roommate gave that to me.

5 Q. And how did your roommate get it if the
6 guards weren't giving them away?

7 A. I don't know. He had been there for
8 two or three years. I'm pretty sure that, you know --
9 he was in there for a minute. He had been in there.

10 Q. So he had to get it from the jail
11 personnel?

12 A. He got it from somewhere.

13 Q. It didn't just fall out -- okay.

14 A. He got it from somewhere.

15 Q. So there's this triplicate and you've
16 never seen a form like that ever before?

17 A. Unh-unh, not that I'm aware of. I'm
18 not aware of any form.

19 Q. Have you found the text message?

20 A. Say again.

21 Q. Have you found the text message?

22 A. No. I'm going through it right now. I
23 will find it. Hold up. All right. There we go.
24 Video, screenshots. Screenshot. It's coming up. One
25 second. There we go. All right. I think it came in.

1 Screenshot, baby. Where we going? Oh, there it is.

2 Okay. All right. Here it go.

3 Well, I never thought your bitch ass
4 nigga boy would sing that fucking song. Remember what
5 comes around goes around. Grand memo. Ain't no love
6 I have to change about you.

7 And this was -- this was the guy --
8 this was the guy where I had spoken to -- I think his
9 name was Ray, ADA Ray. I got his number at the house.
10 I forwarded him the information about Jones, Fuqua,
11 blase blah and them using the street guys to bring
12 harm. So I put it all in an email, blase blah. I
13 sent it to him.

14 And the next day -- it wasn't the next
15 day. Let me correct that. That's a lie because I
16 don't really check the emails. I checked it about
17 maybe three weeks later and I saw this. And I said,
18 damn, that's the guy that I was speaking to the DA
19 about, Rafferty Fuqua, blase blah and now you send
20 back this text message.

21 Q. That text message is from ADA Ray?

22 A. No. It's from the text message that I
23 sent ADA. This guy and Rafferty Fuqua, Frank Jones or
24 whoever, they were conspiring together and I sent --

25 Q. How do you know that?

1 THE DEPONENT: Jeff?

2 Q. What? I'm sorry.

3 A. Hold on. I'm speaking to my attorney.
4 Jeff?

5 MR. FILIPOVITS: I'm sorry. I can't help
6 you.

7 A. Okay. Well, okay. How they conspired
8 together? When --

9 Q. Who -- first of all, stop. Who is this
10 person. What is this person's name?

11 A. He goes by the name of Monster.

12 Q. Well, what's his real name?

13 A. Darryl.

14 Q. Darryl what?

15 A. I don't know his last name.

16 Q. And how does he have your cell phone
17 number?

18 A. I had known him from in the past from
19 New Orleans.

20 Q. You know this person from the past. What
21 date is on the message you just read to us?

22 A. Let me see. August 18th.

23 Q. Of what?

24 A. 2019. 2019.

25 Q. Okay. So you're telling me August 18th

1 of 2019 somebody sent you a text that doesn't say
2 anything in any way connected to this case and you're
3 about to show us how this is connected to this case that
4 happened in 2016?

5 A. Okay. When I spoke with --

6 Q. That's what I would like you to do.

7 A. When I spoke with the DA about the case
8 and about, about what was going on in my personal life
9 from how I was being --

10 Q. What year was that when you spoke with
11 the DA?

12 A. This is 2019. This is the reason why
13 because Ray, DA Ray told me to come down and I was
14 like no, no, no. And I sent DA Ray an email. I said,
15 man, I'm not coming in because blase, blah, blah,
16 blah. They're using the streets to get -- to re-enact
17 revenge on me. It happened on my job. It happened at
18 5191 Jonesboro Road where shots were fired at my
19 house.

20 How do I know? My neighbor came and
21 told me. I was at the movies. They all outside
22 scared for their life. I said what the hell? How
23 somebody shooting up my house now? I don't get into
24 anybody. Roadside. I towed cars. I like cars. I
25 don't have street problems.

1 Q. What job? I thought you hadn't worked
2 since 2017?

3 A. This is -- this is -- this is 2017 that
4 I'm speaking about. This is all in that time frame or
5 period where I stopped working. This is what I'm
6 speaking about. This is why I stopped working.

7 Q. From 2019. So when did you speak to the
8 ADA?

9 A. I spoke to them from 2017 all the way
10 up to 2019. I stopped speaking to them in 2019 when I
11 got this text back from the guy who I spoke to the DA
12 about. That's when I stopped speaking to the DA and I
13 was like, no, y'all got something going on. The text
14 messages are coming back to me about I'm speaking to
15 you about. Something is going on. So that's why I
16 refused to come in to the DA's office because of
17 the -- what reciprocated after I spoke to them. I had
18 no problem --

19 Q. Perhaps you can translate -- (technical
20 difficulties).

21 (Court reporter interruption.)

22 Q. Perhaps you can translate that text
23 because what you read, first of all, I didn't even
24 understand half of it. How do we know that that's
25 connected to this case?

1 A. This guy right here, I don't talk to
2 this guy. It's just someone I know. He's an
3 associate. And he said, well, never thought your old
4 bitch ass nigga boy would sing a fucking song like
5 that. Talking about when I spoke to y'all because I
6 don't speak to anybody during this period of time. I
7 only speak to you and my lawyer, right. Remember --

8 Q. Mr. Robinson, you've given countless
9 interviews.

10 A. No.

11 Q. Countless. At least three.

12 A. To the news?

13 Q. Yes, sir.

14 A. To the news?

15 Q. Yes, sir.

16 A. But the information that I sent to DA
17 Ray had nothing to do with the news. It had nothing
18 to do with anything -- it had nothing do with that.

19 Q. So I don't understand. The text doesn't
20 tell me what song he alleges you're singing.

21 A. The song that I'm singing? Oh.

22 Q. It could be about anything.

23 A. The song that I sung was -- when they
24 say you singing songs, that means you ratting. That's
25 what singing a song means.

1 Q. I get it.

2 A. All right.

3 Q. I'm not that dense. I get that but how
4 do I know that he's talking about this? Where in that
5 text message does it tell you or anybody that this
6 situation is what he's talking about?

7 A. It doesn't but he knows -- he knows
8 Frank Jones personally. He knows --

9 Q. How do you know that?

10 A. He called him on the phone. Because I
11 was talking to him about it like, man, these boys beat
12 me to death, blase blah, blah, blah. Had on fake name
13 tags. He called Frank Jones on his phone and Frank
14 Jones said -- because I'm listening in the background.
15 It's on speaker. Frank Jones says, oh, he acted up in
16 intake. That's what he told this guy right here that.
17 Oh, he was acting up at intake.

18 And I looked at him and I was like, oh,
19 okay, okay. So you know Frank Jones and you keep
20 asking me these questions. And every time you ask
21 this question, either my house gets shot up, somebody
22 following me. Every time I tell you where I'm at --
23 let me just cut you out.

24 So I cut him off, too, and I cut off
25 the district attorney's office because I didn't tell

1 him none of my business. None. I just told him I got
2 beat up. That's it. Nothing more than that. He
3 don't know that -- he don't know that I been to
4 umpteen courts about -- he don't know none of that at
5 all and he don't know how to read. He is illiterate.
6 I have to read stuff for him.

7 So the only way where he could get it
8 is from word of mouth from somebody else because he
9 can't read. Can't read a sheet of paper that you put
10 in front of him. I know -- so I know he ain't read it
11 and I don't talk to nobody at all. When I go home, I
12 lock myself in the house and I don't come outside. I
13 do not contact the woman that I spoke with in the
14 past. I have not spoken with anyone from Atlanta in a
15 very long time.

16 I stay away from anybody who has
17 Atlanta on their name tag because I don't know who
18 they know and who knows who and who knows what so I
19 stay away from everybody. It's impossible for him to
20 send me stuff because I don't talk to nobody from
21 Atlanta. None. Zero.

22 Q. Okay. So what's Darryl's phone number?

23 A. Unh-unh, I don't want to get into that.

24 Q. Well, I'm asking you a question. You
25 said that he's connected and that he's been talking

1 to --

2 A. If I bring that man in court, man,
3 people are going to kill me in Atlanta. I'm not
4 involving nobody but the people that's inside this
5 case. That man got nothing to do with this case.

6 Q. You just testified he did. You testified
7 he has been threatening you and I have a right to follow
8 up on that.

9 A. No, I don't have his number available.
10 That was on Facebook Messenger. You can get it off
11 Facebook Messenger.

12 Q. I'm not on Facebook and you sued my
13 clients and so I'm making a request of you and I will
14 put it orally in writing and I expect to get his number.

15 A. I didn't get his number. It's Facebook
16 Messenger. That's what I keep telling you. It came
17 from Facebook Messenger. He messaged it on Facebook.
18 He didn't dial me. That came on my Facebook
19 Messenger. I just so happened to go through my
20 Facebook Messenger because I don't check it every
21 month or -- I check it every so often and I go through
22 it and I say, damn, this is message me and it's on
23 Facebook Messenger. This is not a telephone number.
24 You can get it from Facebook Messenger. I'm pretty
25 sure Facebook, they got details. They got all their

1 accounts.

2 Q. So you don't have Darryl's phone number?

3 A. No. It came from Facebook Messenger.

4 Q. So what information did you give ADA Ray
5 about Darryl?

6 A. I didn't give -- I gave it about Frank
7 Jones and them using the streets to -- the gist of the
8 message was that they were using people in the
9 streets, offering people in the streets money to have
10 harm done to me.

11 One guy I heard -- his name is Steven,
12 Steven Perkins. I went to the rooming -- it wasn't a
13 room. It was -- where you have to go after prison,
14 that halfway house type thing. So I hear the
15 conversation in the halfway house room type thing and
16 Steven is like, yeah, we're going to get that
17 twenty-five thousand dollars and he going to give us
18 some weed.

19 But I didn't realize that, you know,
20 they talking about me up until someone tried to pry
21 open the door and I called the police. And I'm like,
22 hey, man, somebody is prying open this door, blase
23 blah, blah. Something ain't right about here. Nobody
24 just keep popping up on me everywhere I go.
25 Somebody's got to be targeting me.

1 And once I started saying something
2 like, oh, they're targeting me, then everybody wants
3 to make me seem like I'm crazy but my house ain't
4 never been shot up. I ain't never been followed at
5 work. I ain't never had dummy calls at work.

6 I've been doing towing and recovery so
7 long where I know it's a dummy call before I even go
8 to it by how the person reacts to me over the phone,
9 whether they answer the phone, whether they're with
10 the call, whether they ain't with the call, where the
11 call was. No. I've been doing this for a very long
12 time as far as driving.

13 So to call my phone and to get me to
14 come to the bluff at three o'clock in the morning --
15 you know what the bluff is. Three o'clock in the
16 morning to a church in the bluff at three o'clock in
17 the morning to do a winch out and how you going to
18 winch out a car that's front wheel drive -- rear wheel
19 drive and front wheels stuck in -- the front wheels
20 don't get bogged down. Only the spinning wheels get
21 bogged down.

22 So when I go out there to the one in
23 the bluff, the one I'm speaking of, the front wheels
24 are bogged down and at church at three o'clock in the
25 morning. The driver is not present but there's a

1 bunch of other people that are saying, hey, wait for
2 the driver. I declined the call and told the
3 dispatcher about sending through bogus calls.

4 I mean when somebody is following you,
5 you would know. You know when something ain't right
6 when you're being followed. That happened numerous
7 times in Atlanta. Numerous. Not one time. Enough to
8 make me fear to be around my children, to fear to be
9 around anyone.

10 Q. Mr. Robinson, I'm going to refer you to
11 Plaintiff's Exhibit Bates number 00092 which was
12 provided to me by your counsel. They are the medical
13 records that were produced by the then medical provider
14 at the jail. I'm going to read to you from two
15 different portions again starting with that Bates number
16 that I just read into the record. The time that you
17 were seen at intake and receiving screening was done at
18 9:18 a.m.

19 MR. FILIPOVITS: I'm sorry, Ashley. Can
20 you give that Bates number once more?

21 MS. PALMER: Sure can. 00092.

22 MR. FILIPOVITS: Got it. Thanks.

23 MS. PALMER: You're welcome. And I'm
24 scrolling through that, Jeff, and going past 00093 to
25 00094.

1 Q. So I'm going to read to you what it says.
2 Mr. Robinson, can you hear me?

3 A. Yes.

4 Q. It says examination, general appearance,
5 no apparent distress. Oral screening findings, cuts on
6 lip, low, teeth from altercation. Visible skin exam
7 findings, tattoos, multiple cuts and abrasions. Health
8 education, oral hygiene education provided to patient.
9 Disposition placement.

10 And it goes down and it says referral --
11 referral, excuse me, urgent care clinic order initiated.
12 Behavioral health expedited. Dental referral routine.
13 Then it says consent for treatment signed, yes, and care
14 reviewed, yes. Grievance explained, yes. The
15 information provided is correct on the intake date
16 listed and I accept the provision of mental, dental and
17 mental health care that's electronically approved by
18 Ronald Sanders as of 9:28 and 42 seconds a.m. on May 3,
19 2016. In anything I read there, did you tell me where
20 you pointed out the toe incident, the toe?

21 A. I didn't hear anything where you just
22 said anything but I pointed it out. I pointed it out
23 a thousand times and multiple people a thousand times.

24 Q. Pardon?

25 A. I didn't hear it in what you read but I

1 pointed it out not just to one person but to every
2 person that I came into contact with. I showed them
3 that toe because I'm dark-skinned and it kind of
4 looked crazy when a dark-skinned person turns purple
5 so I kept pointing it out. Man, something ain't
6 right. I can't move it. I kept pointing it out.

7 Q. So also anything about your shoulder at
8 that time?

9 A. Uh-huh, I kept showing it to him. Hey,
10 man, look at my shoulder. My toe, my shoulder. My
11 shoulder and toe.

12 Q. Now I'm going down to 00095 which is the
13 urgent care encounter records from 5:41 p.m. on May 3rd
14 of 2016 and here it says -- again these are your
15 records. History, complaints. Patient was in a fight.
16 Resulted in upper tooth evulsion and one pinky toe
17 laceration. Admits pain. Patient was seen by the
18 dentist for the current tooth injury. He is prescribed
19 Motrin and something I cannot pronounce.

20 A. That was for the swelling to make the
21 swelling go down.

22 Q. And it says denies LOC, headache,
23 dizziness, SOB, chest pain. So it does there indicate
24 that you mentioned the toe but that was after the
25 altercation with the inmate but you say that you had

1 been mentioning it before then?

2 A. Yes, ma'am.

3 Q. So they document it in this record but
4 you acknowledge there was no documentation in the other
5 one, correct?

6 A. Not that I'm aware of.

7 Q. Also under general appearance, it says
8 alert, no acute distress, no obvious deformity. Upper
9 front tooth evulsion, edema to your upper lip. I know
10 that enough to know that's swelling. They talk about
11 your eyes, your lungs being clear, your heart regular
12 rate and rhythm, abdominal soft and nontender, positive
13 bowel sounds.

14 Musculoskeletal. They see one to two
15 centimeter superficial abrasion laceration. One foot
16 fifth dorsal digit, which is the toe that you mentioned.
17 Mild bleeding. (Unintelligible) is well. They said you
18 were moving your extremities well but are you still
19 saying your arm was broke?

20 A. Ma'am, the injury -- the nature of my
21 injury prevents me from doing certain things. I can
22 push off, but as far as pull up on something, it makes
23 it gap worse. It falls down. It's fallen. See, I
24 can push, but as far as lifting stuff up or pulling
25 something, anything that pulls down on it, when it

1 pulls down on it, it put me back in tears. Don't
2 touch me.

3 I have to go back to the hospital.
4 When I get to the hospital, all they do is write an
5 opiate prescription. That don't help because after I
6 do the opiate prescription I'm still hurt. And when
7 the opiate wear off, it's one hundred times worse
8 because I thought that, you know, the opiates make you
9 think that you're, you're healthy and you're fine.
10 You don't feel the pain but in all actuality all you
11 do is tear it up more. So opiates is -- unh-unh.
12 That's more pain. Unh-unh.

13 Q. Your charge from 2011, the aggravated
14 assault, what was that in reference to?

15 A. Well, my mother was dying of cancer.
16 My mother and father were fighting. I got into the
17 middle of it, which I shouldn't have, and I wound up
18 with an aggravated assault. I'm defending my mama.

19 When it came down to court, I had the
20 option to testify against my father and we both go to
21 jail. I was already in jail and leave my mother who
22 was terminal with cancer with no one to take care of,
23 alone or take the charge and leave her with her
24 husband. I took the charge and left her with her
25 husband. I would do it again just to see my mother

1 live a little bit longer.

2 Q. So the charge for aggravated assault
3 meant that you allegedly used some kind of object to
4 assault someone.

5 A. Yeah.

6 Q. So what was the object?

7 A. The object? It was a broomstick and
8 they said it was assault because it had blood on it.
9 My blood was on it. They thought it was his blood but
10 it was my blood. I didn't want to put my parents
11 through that because my mother was dying at that point
12 and then my father -- I know the captain go down with
13 the ship. He was a naval captain. I knew what he was
14 going to do so I took the charge. I'd take it again,
15 too. I didn't hit anybody but I would take that
16 charge just to have my mama live a little bit longer.

17 Q. When you were in jail on May 3rd, they
18 did a mental health evaluation 2016 and one of the lines
19 in here says patient stated that he used to take
20 anti-psychotics but it has been many years since he last
21 had meds. What anti-psychotics did you used to take?

22 A. I didn't know -- I should have said
23 antidepressants but I don't know the name of it. It
24 was the antidepressants. When my mother first had
25 came down with the multiple myeloma, my world came to

1 an end. I was severely depressed because multiple
2 myeloma, it ain't like regular cancer. It has a --
3 ten years. It's like, oh, she's got ten years to
4 live.

5 So when I figured out my mother only
6 had so long, I was depressed. Super depressed.
7 Nothing, nothing can compare (sic) you for it. No
8 medicine they give can medicate you. That's something
9 that you have to live through. There's no cure for
10 that at all.

11 Q. Also in your Grady records, it indicates
12 you had a diagnosis of schizophrenia at some point. Is
13 that correct or incorrect?

14 A. Schizophrenia?

15 Q. Correct.

16 A. In that jailhouse, everybody --

17 Q. In the Grady records.

18 A. The Grady records? The schizophrenia?
19 They said that all came from the depression on my
20 mother and father. They said that was a misdiagnose.
21 You're not schizophrenic.

22 Q. Who said you were misdiagnosed?

23 A. The people at Mercy, Mercy Care. Mercy
24 Care. You're not schizophrenic or none of that.
25 That's the life. Get used to. That's life. People

1 die. God's plan. So all that bipolar -- I was -- my
2 parents and all that stuff was dying.

3 Q. So Mr. Robinson, in Plaintiff's Bates
4 number 00105, you referenced earlier you were
5 polygraphed and it actually says an inconclusive opinion
6 was rendered. Are you aware that it says it was
7 inconclusive rather than your testimony that you passed?

8 A. No. My paperwork says that I passed.
9 They never gave me an inconclusive. I never --

10 Q. This is what your lawyer sent to me.

11 A. No, no. The one that was
12 inconclusive -- the one that was inconclusive was
13 Frank Jones. Frank Jones was inconclusive. You must
14 have misheard what he said. I passed mine. Flying
15 colors.

16 Q. I'm looking at Plaintiff's Bates number
17 00105 and I'm sorry that I can't show it to you on
18 screen.

19 A. You have to send that to the lawyer
20 because the judge --

21 Q. The lawyer sent it to me, sir. This is
22 what I got from your lawyer. That's why I'm reading the
23 Bates number to you. It's your document.

24 A. No.

25 Q. Your document. It says subject, William

1 Robinson. Also lists you as being the alleged victim
2 and it says it's the polygrapher's opinion that your
3 (technical difficulty) an opinion, therefore an
4 inclusive opinion is rendered.

5 A. No.

6 Q. That's what it says from your Bates --

7 A. When I left the GBI, the GBI, the
8 GBI --

9 Q. GBI document. This is a GBI document.

10 A. GBI didn't say inconclusive. They
11 didn't say -- they didn't say anything. Everybody
12 said that I passed that. This is the first time I'm
13 hearing inconclusive.

14 Q. You need to ask your lawyer to send you
15 Bates number 00105.

16 A. I passed my lie detector. Judge
17 Schwall even looked at the paper and Judge Schwall
18 said I passed the lie detector so I don't know -- I
19 don't know where you're getting this from.

20 MR. FILIPOVITS: On 00105?

21 MS. PALMER: Yes, 00105. What's your
22 question, Jeff?

23 MR. FILIPOVITS: I thought you said that
24 it stated it was inconclusive but --

25 MS. PALMER: It does say that.

1 THE DEPONENT: It doesn't. I passed.

2 MR. FILIPOVITS: Can you just read that
3 portion? I'm just not --

4 MS. PALMER: Based up on the polygraph
5 chart recordings of subject (technical difficult)
6 opinion that chart records were not adequate to form a
7 definite opinion. Therefore an inconclusive opinion is
8 rendered. Polygraph Reynolds. Subject was Robinson.

9 THE DEPONENT: No, I never --

10 MR. FILIPOVITS: Read two paragraphs
11 above it.

12 MS. PALMER: It says deception was not
13 noted but it also says it was inconclusive.

14 THE DEPONENT: I think you might be
15 reading Frank Jones.

16 MR. FILIPOVITS: Read the options though.
17 It says deceptions were not noted.

18 MS. PALMER: Were not noted.

19 MR. FILIPOVITS: And the next one says
20 were noted.

21 MS. PALMER: It does say that. That's
22 why -- because one says were not noted and one says were
23 noted.

24 THE DEPONENT: No. This is the first
25 time I've ever heard that and OPS --

1 MR. FILIPOVITS: We're not the ones to --
2 this witness is not going to figure out what that means.

3 MS. PALMER: Well, this witness testified
4 he passed so I have a right to ask him about that.

5 THE DEPONENT: I did pass. You're the
6 first person that said it was inconclusive. OPS said
7 that I passed. Judge Schwall said that I passed. The
8 GBI said that I passed. You're the very first person on
9 planet Earth that said I failed.

10 MR. FILIPOVITS: You can look at 00103.
11 It's Fuqua's polygraph.

12 MS. PALMER: I looked at --

13 MR. FILIPOVITS: His name is -- the name
14 is listed on one of those three options. I mean I don't
15 want to get into it anymore but I'm not sure that's the
16 proper interpretation of that document.

17 THE DEPONENT: Yeah, I think you're
18 misreading that.

19 MS. PALMER: It may not be. It's your
20 document.

21 THE DEPONENT: May I use the restroom
22 just for two seconds?

23 MS. PALMER: We can take a ten minute
24 break.

25 (Brief recess.)

1 Q. (BY MS. PALMER:) So earlier when we
2 first started, Mr. Robinson, you had testified -- I
3 think you used the words that your body was broken down
4 from doing the towing. What exactly was going on with
5 your body?

6 A. Well, you have to secure the cars with
7 J hooks and the J hook maybe weighs like twenty,
8 twenty something pounds. When I extend my arm to go
9 under the car between the bed and the car, I could no
10 longer lift up the J hooks because it pushes down on
11 my injury and in my elbows, too, but it -- I can't
12 lift it up with one hand, two hands. It's hard
13 because of my shoulder injury. Then when I get --

14 Q. I'm not referring to your shoulder
15 injury. Before 2016, you indicated that your body had
16 been broken down.

17 A. Oh, no, no. Oh, no, no, no. That's --
18 you're mistaken. Before 2015, I had -- '16, I had no
19 medical issues. I had never had a medical issue in my
20 life. I never had no broken bones, no nothing ever
21 before twenty -- before this incident. I was in good
22 health. Good shape. Unh-unh, no. No injuries at all
23 before 2016.

24 Q. So when you indicated earlier about the
25 towing and your body breaking down, you weren't talking

1 about --

2 A. 2016. No. I was talking about that's
3 after, after the incident. That was not before.

4 Q. When was the last time you worked in the
5 towing industry?

6 A. Twenty -- 2014 is when I started the
7 roadside, 285 Roadside. So I did that 2014, 2015,
8 2016. Before, before the roadside was towing. I was
9 good with all my employers. I was the hardest working
10 tow truck driver they had. No injuries, no nothing.

11 Q. So what treatment were you given for your
12 shoulder and your toe when you went to Grady?

13 A. Well, the lady said that in order for
14 them to do surgery on it I had to get insurance. I
15 couldn't get insurance because I couldn't stay long
16 enough at a job without hurting myself.

17 Q. Wait a minute. Who mentioned that you
18 needed surgery?

19 A. The people at Grady and they said they
20 wouldn't perform it unless I had insurance.

21 Q. And what exactly did you need surgery
22 for?

23 A. The shoulder. The shoulder needs
24 surgery.

25 Q. So those medical records that your

1 counsel provided me recommended you have surgery?

2 A. Uh-huh. They had me scheduled but I
3 didn't get the insurance that they required. I didn't
4 have insurance.

5 Q. You were scheduled for a surgery?

6 A. No. Hold on. Hold on. I was not
7 scheduled for the surgery. I was scheduled -- they
8 were scheduling the surgery, but in order to get it
9 scheduled, I must have insurance or they would not
10 operate on me and I didn't have any insurance.

11 Q. And what was the surgery supposed to be
12 for?

13 A. My shoulder.

14 Q. I understand that. What was the surgery
15 supposed to be for?

16 A. I guess to fix it. To fix it because I
17 can't lift anything with it. They was going to fix it
18 because the bones that you see are supposed to be even
19 with my shoulder. So my shoulder is down about maybe
20 that much.

21 Q. So the records that Mr. Filipovits sent
22 over to me when we started the deposition will reflect
23 somewhere in there a conversation with you about
24 surgery?

25 A. It should because that's what they

1 said. It should. That it needed to be corrected.

2 Q. What was the treatment for your toe?

3 A. They said there is no treatment. They
4 gave me a foot cast and they said there's nothing that
5 they can do. It's past the time. It's already
6 started healing.

7 Q. You were in a cast?

8 A. Yeah. When you break your toe, they
9 give you a foot cast. Not the cast that goes all the
10 way around but it's a cast that you can take on and
11 you can take off to prevent you from damaging your toe
12 anymore. They gave me a foot cast.

13 Q. And how long did you wear that?

14 A. A couple of months.

15 Q. Okay. Do you have pictures of yourself
16 in this foot cast?

17 A. No, I don't. No.

18 Q. Do you still have the foot cast?

19 A. No, I don't.

20 Q. So the records will reflect you were
21 given a foot cast?

22 A. Yeah, uh-huh. Yeah, I remember
23 catching the bus home with one shoe and that foot cast
24 on.

25 Q. So your counsel sent over some medical

1 records to me and numerous pages were missing. I would
2 like all of those pages. Is that going to be an issue?

3 THE DEPONENT: Is that going to be an
4 issue, Jeff?

5 MR. FILIPOVITS: Well, I -- hold on one
6 second. There were a lot of medical records that I did
7 not know were responsive to your request. Let me look
8 for what you asked for.

9 So you sought all records that you
10 contend support damages sought or to be sought in this
11 action and all treatment that was sought or received as
12 a result of the injuries alleged in the complaint.

13 There were other medical visits but they
14 were not related to injuries nor are they -- nor does
15 the plaintiff intend to rely on them in support of their
16 claim for damages. So if you're telling me that you
17 want to broaden that request, that's fine.

18 MS. PALMER: No, but -- so you're telling
19 me that pages 32, 33, 34, 35 -- sorry. I'll give you
20 the labels in a second. There are a bunch of records
21 that were taken out from the Mercy and it starts with
22 page 32 which is Bates stamp number as Plaintiff's
23 00888. You're saying all the records before that had to
24 do with something else?

25 MR. FILIPOVITS: Hold on one second. I

1 will give you an example. We've got November 2018 visit
2 complaining of ringworm.

3 MS. PALMER: Got it.

4 MR. FILIPOVITS: I didn't think that was
5 relevant. I can do a more thorough -- I mean I will be
6 happy to review these again obviously because I made a
7 mistake before. I will go through it again.

8 MS. PALMER: Yeah, if you could just
9 review it again, I found it curious I got pages that
10 start at page 32. That's all. If it's ringworms,
11 clearly I don't want to know about that.

12 MR. FILIPOVITS: Right. And there are a
13 number of visits that have nothing to with anything.

14 MS. PALMER: I presume the records they
15 printed were from any time they have seen him. Is that
16 right?

17 MR. FILIPOVITS: Right. So I did not
18 produce a complete set. I think a complete set would be
19 outside the scope of what's relevant. You know, I was
20 careful to be responsive to your request as we always
21 are. I will do another review and make sure. If you
22 have any doubts, we can talk about that more but there
23 were visits that had nothing to do with that.

24 MS. PALMER: Okay. Thank you. I
25 appreciate that. Give me one more second, Mr. Robinson.

1 I'm going to review your complaint one more time to make
2 sure.

3 Q. So Mr. Robinson what are the damages that
4 you are seeking as a result of the injuries that you
5 allegedly sustained?

6 A. Teeth, shoulder.

7 Q. Okay. Let's stop for a second. What
8 about your teeth?

9 A. They're gone.

10 Q. I'm aware of that. What precisely would
11 you like to be paid for because your teeth are gone?

12 A. I'd like my teeth back and the pain
13 associated with it.

14 Q. What kind of pain have you been
15 experiencing as a result of having no teeth?

16 A. You can't get a job with no teeth.
17 When you go up to someone and you ask them about a
18 job, you have no teeth, they say you scare the
19 customers. I've heard that before.

20 Q. I thought you said you had made a
21 decision not to work since 2017 because your body was --

22 A. I'm telling you the reasons, the
23 reasons people give when you have no teeth because --

24 Q. I understand that. I understand that.
25 Let me stop you for a second. You testified way earlier

1 that the reason why you weren't currently employed is
2 because your body had broken down. Is it now that you
3 are saying you were missing teeth and you couldn't get a
4 job?

5 A. No, ma'am. The teeth is just one part
6 of it. It's just --

7 Q. What jobs have you attempted to apply for
8 and were denied because of your teeth?

9 A. Towing jobs. When I tried to get back
10 to it, towing. They didn't just deny for my teeth.
11 They denied me for the overall health because I
12 couldn't lift the chains or when I couldn't properly
13 secure the vehicle with getting on my knees.

14 Q. So in your complaint on page three of
15 your complaint, I'm going to see if I can share this
16 with you. Can you see what's on my screen?

17 A. Uh-huh.

18 Q. Page three, number 14 -- excuse me.
19 Let's start number 13. After dragging plaintiff to a
20 separate area of the jail, each of the three officers
21 participated in assaulting plaintiff. You're now saying
22 that's not correct?

23 A. Well, they all participated in it
24 because they were all actively there. No one stopped
25 it so they're participating silently. They're -- they

1 didn't stop it. They didn't say, hey, you're
2 violating the law. So they are active participants.
3 If I would have thrown a punch, they would have
4 actively participated then.

5 Q. Okay. We're not talking about
6 hypotheticals. I'm asking you when you state in your
7 complaint after dragging plaintiff to a separate area of
8 the jail, each of the three officers participated in
9 assaulting him -- and we're all grown. We know what
10 assaulting means. That means laying hands on someone.
11 I mean you know the legal definition of assault. You
12 had an aggravated assault charge. So it's not thinking
13 in your mind you're going to hit somebody.

14 So is that -- are you saying now that
15 that is not what took place and somebody actively
16 assaulted you? Not passively, not somebody in their
17 mind. Actively assaulted you.

18 A. The question is did three people
19 actively assault me?

20 Q. Correct. Correct.

21 A. One person assaulted me. Two stood by
22 and watched.

23 Q. Watched from another room, correct, where
24 they couldn't see?

25 A. No. The incident began in front of

1 them and I was dragged to another room. The punches
2 and the slapping started in a different room and that
3 was in front of them.

4 Q. In paragraph 15 which I've now gone to,
5 during the attack, two of plaintiff's teeth were knocked
6 out. Are you still sticking by that two were knocked
7 out?

8 A. Uh-huh. Yes.

9 Q. Well, when you testified before Judge
10 Schwall, you said it was three. So was it two or three?

11 A. It could be four because the last one
12 was messed up, too, but it didn't come out. The last
13 one was not jagged but the other ones, gone. So yeah,
14 they did it.

15 Q. So you're missing four teeth. Your
16 complaint alleges two but now --

17 A. No, no. My complaint should allege --

18 Q. Okay. Let me get my sentence out. So
19 you have testified that they knocked four of your teeth
20 out. Your complaint says two. Before Judge Schwall,
21 you testified that one was knocked out and two were
22 loosened. So which one is it?

23 A. When the incident was over, three teeth
24 were missing and the fourth tooth which I had removed
25 in prison, that was -- it was badly chipped up. It

1 was chipped up real bad but it was still a tooth but
2 the prison removed it so it had to be bad, too. All
3 four of the teeth -- all the damage from my mouth came
4 from them.

5 Q. You testified about being in solitary
6 confinement. Do you mean being placed on the 7th floor?
7 Is that what you mean by solitary confinement?

8 A. Solitary confinement. No roommate at
9 all. I didn't have a roommate at all. Solitary
10 confinement.

11 Q. I'm not asking about a roommate. Just
12 because you don't have a roommate doesn't mean you're in
13 solitary confinement. Does that mean they had you
14 locked down for a certain period of time without
15 interaction with other people?

16 A. Exactly.

17 Q. Is that what you're saying? Where was
18 that?

19 A. The 7th floor.

20 Q. So the 7th floor is not a solitary
21 confinement floor. Did they have you in a solitary
22 confinement room?

23 A. Yeah, they had me in a room by myself.

24 Q. Okay. So you were by yourself.

25 A. Uh-huh.

1 Q. Does that mean that you were never
2 allowed out to have interaction with other people?

3 A. Got out to take a shower and that's it.
4 One by one. There was no group getting out. They let
5 each person out of a cell one at a time. I had enough
6 time to talk to the guy and point out my injuries,
7 take a shower, go back in the room.

8 Q. So that's because you were housed on
9 seven which is the maximum security floor, not because
10 you were in solitary confinement?

11 A. Well, when -- I was under the
12 impression when you get into a fight inside of the
13 facility --

14 Q. Uh-huh.

15 A. -- you go to solitary confinement and
16 that's where I --

17 Q. What is your definition of solitary
18 confinement?

19 A. In a room by yourself. No contact with
20 anyone. That's solitary confinement.

21 Q. And never allowed out?

22 A. Well, they got to give you time to take
23 a shower. The only time I was allowed out was to take
24 a shower.

25 Q. That was true for everybody on the floor.

1 Isn't that correct?

2 A. Yes.

3 Q. Okay. So everybody was in solitary
4 confinement on the 7th floor?

5 A. Yeah. Nobody had a roommate.

6 Q. Okay. That's not my question about
7 having a roommate, sir. My question is are you saying
8 that everybody on the 7th floor is in solitary
9 confinement?

10 A. Yes.

11 Q. Simply because they had no roommate and
12 that's what you define as being solitary confinement?

13 A. The 7th floor is the worst floor you
14 can go to.

15 Q. I understand that.

16 A. They don't -- they don't -- they don't
17 have roommates on the 7th floor.

18 Q. Okay.

19 A. At all. It's solitary confinement.
20 You're by yourself. There is no one else. Solitary
21 means you're by yourself. Solitaire. There was no
22 one. They come around and they feed you through a
23 slot. They give you 30, 45 minutes to take a shower.
24 Then you go back in the room.

25 Q. And that wasn't just you, correct? That

1 was everybody on the 7th floor?

2 A. As far as I know. When I got back in
3 the room, there was only like a little bitty hole that
4 you can see through so --

5 Q. Did you ever see anybody through that
6 little bitty hole congregating in groups --

7 A. No.

8 Q. -- that you weren't allowed to congregate
9 in?

10 A. No.

11 Q. Okay. So on paragraph 43 which I'm
12 showing you now, it says in addition to the internal
13 investigation which was opened by the sheriff's office,
14 the circumstances surrounding the use of force against
15 by plaintiff are also subject to an ongoing
16 investigation by the Fulton County District Attorney's
17 Office. You testified that you no longer intend to --
18 you haven't been cooperating with the DA's office?

19 A. Oh, yes, I've been cooperating with the
20 DA's office. We have a good rapport.

21 Q. I thought you said you aren't talking to
22 them anymore because they --

23 A. I wasn't talking to those guys. They
24 put another attorney on it and --

25 Q. Who is that person?

1 A. Let me see.

2 Q. Because I will represent to you that I
3 personally spoke to Deputy District Attorney Adam Abbate
4 and he told me that you haven't been cooperating.

5 THE DEPONENT: Jeff, what's the name of
6 that attorney?

7 MR. FILIPOVITS: Robert, hold on a
8 second. Let me think about this for a moment. Okay.
9 All right. So his name Robert Schollmeyer,
10 S-c-h-o-l-l-m-e-y-e-r.

11 Q. And when is the last time you spoke with
12 him, Mr. Robinson?

13 A. I don't recall the date. It's been a
14 few weeks. Maybe about -- say maybe three weeks.
15 Maybe about three weeks, maybe four. It's been a
16 month.

17 Q. And when you spoke to him last, what was
18 the update that was provided concerning your criminal
19 case?

20 A. He said that he was impressed with what
21 was going on.

22 Q. What does that mean, he was impressed by
23 what was going on?

24 A. I don't know. You have to ask him what
25 that means. And that the case is on his desk and that

1 they're going forward. I haven't spoke with him
2 since. He just left it open and said they're moving
3 forward.

4 Q. Were you confused when he used the word
5 impressed?

6 A. No. Impressed could mean a lot of
7 things.

8 Q. What do you take that to mean?

9 A. It could mean a lot.

10 Q. I'm asking you what did you take the word
11 impressed to mean?

12 A. That it was impressionable.

13 Q. All right. Go back to your injuries. So
14 you are wanting damages for all four teeth even though
15 one was pulled by the DOC. Is that correct?

16 A. Had he had not put his hands on me I
17 wouldn't need no teeth from nobody. Had not they
18 touched me, I would be happy in life. Had not they
19 did what they did to me, I would be able to live a
20 normal life. I can't run with the kids. I can't work
21 too long. I can't do the things that I normally would
22 do.

23 Q. Because of your teeth?

24 A. No. Because of my knees, because of my
25 hip because of my shoulders.

1 Q. Wait a minute. Let me stop. What
2 happened with your knees and your hip? You never said
3 anything about that.

4 A. When someone drags you by your -- the
5 opposite way, everything hyper-extends, much less pull
6 you around the corner. There's a lot of tears that
7 happen in between the time.

8 Q. And what treatment have you received for
9 those?

10 A. I've gotten shots. They say it's
11 neuropathy where I can't feel my legs and my arms at
12 certain times. I was on pills for that, too. They
13 call it --

14 Q. Do you have those records that you could
15 provide?

16 A. Uh-huh, and I went to Grady. Grady
17 neurologist. I was having issues with my fingers.
18 Not carpal tunnel syndrome but -- no, excuse me. Not
19 cubital tunnel syndrome. No, it's cubital, not carpal
20 tunnel syndrome where my fingers go numb and a few of
21 my toes go numb. I can feel half and I can't feel the
22 other half. They were giving me shots.

23 Q. What are they saying that's a result of?

24 A. Shock. Like some type of --

25 Q. Shock?

1 A. Some type of reaction from the shock.
2 I told them what happened with the shocks, the tasers
3 and they said this could be possibly from that
4 incident but I've never lost the feeling in none of my
5 body parts ever. This is like strange. I wake up out
6 of my sleep with my arms and my legs dead. It feels
7 like pins are in my arms and my legs.

8 Sex. Don't have that. The orgasm
9 hurts. There is no need for a female. There's no
10 need for any -- anything like that because the orgasm
11 hurts. The walking. When I walk too far, my knees
12 hurt and what's crazy is they hurt until I pop them.
13 And when I pop them, my hip pop back in place, pop,
14 and then it feels a little bit better until it pops
15 back out of place.

16 Being drug in the opposite direction, I
17 would have had better luck being drug by a car than to
18 be jacked and jerked because that pulled everything
19 apart.

20 Q. And where are records that reflect that
21 dragging caused all of these issues to your body?

22 A. I don't have any records that say that.
23 That's the only thing that happened to me.

24 Q. Did you either of your parents have
25 arthritis?

1 A. No, ma'am.

2 Q. And prior to these visits to Grady that
3 you made back in 2016, beginning in 2016, do you have
4 any complaints of any other ailments that you presented
5 to Grady with?

6 A. No, I -- no. Nothing.

7 Q. Your attorney is going to take a look,
8 but if there are records that reflect prior ailments
9 that you complained of prior to 2016, I would like those
10 records.

11 A. No, there are no ailments at all. I
12 never went to the hospital for anything before this
13 issue. I've never been --

14 Q. You never saw a doctor before 2016 in
15 your life?

16 A. I saw a doctor but not for no pain or
17 breaking anything or anything like that. I've never
18 had any serious injuries. Nothing. None of that. No
19 serious injuries.

20 Q. Right. But the things that you're saying
21 about the pulling, those aren't going to be in any
22 records. That's just you saying that?

23 A. I guess, yeah, that's just me saying
24 that because when I addressed it to them what they say
25 is you did not come when you were supposed to be down

1 here. When it happened, you had a couple of hours to
2 get here. You didn't come in a couple of hours. Your
3 body has started healing. It's in its healing
4 process.

5 Q. I'm not talking about the shoulder and
6 toe.

7 A. I'm talking about knees, too. I went
8 down there with my knees. I put on some Timberland
9 boots and the boots were too heavy. It pulled against
10 my knees. I went down there and they said, oh, we
11 can't find it but I'm like, man, I feel pulling in my
12 knees. I know it feels like it's being pulled apart.
13 Oh, we can't find it. They said when did it happen.
14 It happened blase blah. They didn't take me
15 immediately to the hospital.

16 Q. What does blase blah mean, sir? I need
17 you to --

18 A. Blase blah means it happened when I got
19 assaulted. It happened when I got assaulted in 2016.

20 Q. I need you to say that. The Court can't
21 interpret --

22 A. You're right. You're right. I'm
23 sorry. It happened in 2016. I was not taken to the
24 hospital and they pulled me by the shackles and now my
25 hip or my knees, it hurts. It hurts.

1 Q. Right.

2 A. The only thing --

3 Q. You went to the doctor and they can't
4 find any evidence of any injuries but you want damages
5 because you're articulating that?

6 A. Because I was not taken to the
7 hospital. If I was taken to the hospital, I'm not
8 saying I would not be in pain. I'd still probably
9 feel some pain but it wouldn't be as bad as it is.
10 The beating went unchecked with no medical help. If
11 they would have gave me medical attention, it
12 wouldn't -- it wouldn't -- it wouldn't be this drastic
13 of a life change for me.

14 Q. You saw someone in the clinic, sir.

15 A. Excuse me?

16 Q. You saw someone in the clinic, did you
17 not?

18 A. In the jailhouse clinic?

19 Q. Correct.

20 A. Ma'am, inside the jailhouse clinic,
21 they don't -- they ain't -- they ain't did no x-rays.
22 They didn't do nothing but look at it. Oh, okay, and
23 that's it. They didn't -- they was more concerned
24 with having me in the cell than to treat my medical
25 damage. Black people don't -- black people doesn't

1 turn purple.

2 Q. They didn't give you anything? Because
3 the records reflect you were given several
4 medications --

5 A. Tylenol.

6 Q. -- I can read off.

7 A. Tylenol, Tylenol. That Tylenol, they
8 took me off Tylenol as a matter of fact because the
9 pain was so severe where I would over-medicate and
10 they said you can't take it -- take Tylenol like that
11 but Tylenol, that's for topical. Tylenol is not for
12 pain at all. That's for a headache. Tylenol does not
13 help at all.

14 I could take twenty Tylenols, walk
15 outside and still feel the pain. So I can't take
16 ibuprofen. They took me off. They had me on eight
17 hundreds. They had me on six hundreds. They had me
18 on the max with Tylenol and none of that works for
19 pain. If the Percocet -- and I'm telling them no, I
20 don't want any Percocet. If the Percocet is not
21 working for pain, Tylenol is nothing.

22 Q. So other than not giving you sufficient
23 pain medication at the jail, what else did Grady do for
24 you that they didn't do for you at the jail?

25 A. Grady, Grady, Grady -- they didn't do

1 at the jail? They didn't do any x-rays at all. They
2 didn't -- they didn't do any of that. They just
3 shipped me on to the front -- excuse me -- to the
4 upper room.

5 Q. And what did the x-rays show according to
6 you?

7 A. It shows the bulge that's in my
8 shoulder. It shows the bulge that something ain't
9 right in my left shoulder. It showed that. Once they
10 saw it on the x-ray, that's how they prescribed the
11 Percocet. They don't just prescribe the Percocet
12 because I have a topical cut or I've got a swollen
13 finger. You know, they give you the Percocet --

14 Q. Back to my question. Other than giving
15 you narcotics, what did they do at Grady -- and the
16 x-rays which --

17 A. They x-rayed -- they x-rayed and they
18 were attempting to do the surgery on it, but as I
19 stated, I had no insurance to pay for the -- I had no
20 money to pay for the insurance nor could I last long
21 enough at a job to acquire medical insurance through
22 the job because I would get hurt before then.

23 And the only thing the doctor would do
24 is give me Percocet and then you can't drive and move
25 tons of cars or anything with a car on Percocet at

1 all. Can't do none of that. That's DUI. So all they
2 did was just medicate me and hope that it went away
3 but it hasn't gone away at all.

4 If I should go out here and try to weed
5 eat for two hours. In two hours, I drop the weed
6 eating machine because I lose control of my hands and
7 the weed eating machine falls, the shoulder falls and
8 I feel the pain in my back and ain't like no back pain
9 you ever felt. It feels like someone is stabbing me.
10 It's like a stabbing in my back, a sharp pain, the
11 worse pain ever. You have to lay down. There is
12 no -- no, unh-unh.

13 Q. And so you're seeking damages for the
14 teeth, your shoulder, your knees, your back and your
15 leg. Is that correct?

16 A. And my genitals. And my genitals.

17 Q. Okay. Have you put a value on those
18 damages?

19 A. Ma'am, I ask myself that every day when
20 I wake up. I pray. I meditate when I wake up and I
21 ask God to take it away and I pose that question.
22 Could you put a dollar amount on it and for my loss.
23 I can't. I can't put a dollar amount on that. I
24 can't. It's impossible. Can't put a dollar amount on
25 it, on your private area. You can't put a dollar

1 amount on being able to walk down the street. You
2 just -- you can't put a dollar amount on it when you
3 wake up in pain out of sleep. It's something that you
4 just --

5 Q. All right. I'm going to be -- I think
6 we've already discussed follow-up documents I'm going to
7 be requesting from your -- if there are any relevant
8 ones from your attorney. I think I also am going to
9 need follow-up documents on your probation, especially
10 since you have the allegation that Fuqua and your
11 probation officer had a relationship. So I'm going to
12 be reaching out to her and I probably will need to get
13 those records so I can talk with her about that.

14 A. Yeah. Now on that, I think that says
15 Valerie, it's either Valerie or Veronica but I know
16 it's V. Mims.

17 Q. I wrote that.

18 A. I'm not sure of her first name but I
19 just know it's V. Mims.

20 Q. Okay. I wrote that down. And then --

21 MR. FILIPOVITS: Ashley --

22 MS. PALMER: Yes.

23 MR. FILIPOVITS: I'm sorry. I didn't
24 mean to cut you off.

25 MS. PALMER: It's okay.

1 MR. FILIPOVITS: With regard to the
2 medical records, so what I request that you do because
3 it sounds like some of what you're saying you want which
4 I agree would be relevant would fall outside of the
5 scope of what you specifically requested in the request
6 for production, could you just get me a new request for
7 production --

8 MS. PALMER: Sure.

9 MR. FILIPOVITS: -- in writing so I
10 can -- I don't want to disclose medical records of my
11 client unless I have a lawful request.

12 MS. PALMER: I understand that.

13 MR. FILIPOVITS: Something in writing.

14 MS. PALMER: Certainly.

15 MR. FILIPOVITS: We can go outside the
16 scope of what I initially produced even though I don't
17 think there's anything that's relevant but I understand
18 that you -- given on what you touched on and talked
19 about today, I think that it would be proper for you to
20 request that stuff.

21 MS. PALMER: No, and I appreciate that.
22 I can put that in writing. I don't have an issue with
23 that at all.

24 MR. FILIPOVITS: Okay. And if we need to
25 reconvene at some point, we can talk about how to handle

1 that.

2 MS. PALMER: Okay. Thank you. I was
3 going to mention that so thank you for bringing it up
4 for me. All right. I think that's all I have unless
5 you have anything you need to ask your client.

6 MR. FILIPOVITS: No.

7 MS. PALMER: All right. Thank you, Mr.
8 Robinson.

9

10 FURTHER THE DEPONENT SAITH NOT

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

C E R T I F I C A T E

STATE OF ALABAMA)

MOBILE COUNTY)

I hereby certify that the above
proceedings were taken down by me and transcribed by me
and that the above is a true and correct transcript of
the said proceedings given by said witness.

I further certify that I am neither of
counsel nor of kin to the parties nor in anywise
financially interested in the outcome of this case.

JAN A. MANN

COMMISSIONER - NOTARY PUBLIC

ACCR NO. 321

A	across (1) 106:13	afraid (2) 104:13;130:7	9:21	163:15;167:12;
	acted (3) 48:7;123:3;	afternoon (1) 91:8	aliases (1) 9:22	177:22
a/k/a (5) 42:14;47:19;	148:15	again (19) 28:14;32:13;	align (1) 127:8	apart (3) 117:11;181:19;
84:4;120:13;122:6	acting (2) 5:2;148:17	44:7;10;46:3;	alignment (1) 93:2	183:12
Abbate (3) 129:22,24;178:3	action (3) 5:19;139:14;	67:20;99:6;112:11;	allegation (1) 188:10	apparent (3) 56:20;69:13;
abdominal (1) 156:12	168:11	123:9;124:13,23;	allege (2) 77:10;173:17	154:5
ability (2) 8:14;9:7	active (1) 172:2	142:20;153:15;	alleged (2) 161:1;168:12	apparently (1) 33:12
able (5) 12:8;35:5;57:1;	actively (5) 171:24;172:4,15,	155:14;157:25;	allegedly (3) 85:25;158:3;	appear (1) 114:6
179:19;188:1	17,19	158:14;169:6,7,9	170:5	appearance (5) 56:20;69:12;
abnormality (1) 93:3	actual (1) 93:16	against (14) 7:2;32:5;44:6;	alleges (3) 80:8;147:20;	73:12;154:4;156:7
above (2) 5:8;162:11	actuality (1) 157:10	52:1;88:23;105:17;	173:16	appears (1) 92:22
abrasion (4) 64:1;67:2;70:23;	actually (4) 7:15;69:8;115:7;	127:17,18;133:17;	allow (1) 136:14	apply (1) 171:7
156:15	160:5	135:16;140:4;	allowed (5) 5:24;175:2,21,	appreciate (2) 169:25;189:21
abrasions (3) 56:19;69:12;	acute (4) 92:24;94:8,9;	157:20;177:14;	23;177:8	approved (1) 154:17
154:7	156:8	183:9	Allstar (1) 16:10	approximately (5) 60:18;69:1,4,9,
absolutely (1) 30:25	ADA (5) 143:9,21,23;	agg (1) 22:13	Almost (2) 53:21;91:8	19
abuse (1) 39:12	146:8;151:4	aggravated (8) 19:5;20:12;	alone (1) 157:23	April (8) 106:20,21,21;
abused (1) 38:8	Adam (2) 129:21;178:3	22:17;29:17;	along (1) 19:6	108:7;109:11,12,
abusing (1) 48:10	added (1) 41:7	157:13,18;158:2;	altercation (6) 60:21;63:7;	16,16
accept (2) 15:22;154:16	addition (1) 177:12	172:12	86:18;110:18;	area (11) 29:3,6;69:1;
acceptable (1) 23:14	additional (1) 58:16	aggression (1) 59:22	154:6;155:25	100:8;103:18;
access (1) 42:3	address (5) 10:2;36:11;	aggressive (1) 27:3	altercations (1) 110:22	120:14,21;126:12;
accident (1) 19:12	109:19;114:24;	agitate (1) 54:14	alternators (1) 17:1	171:20;172:7;
accidentally (1) 36:2	135:4	ago (1) 129:23	always (2) 129:16;169:20	187:25
accompanied (1) 30:18	addressed (4) 27:11,12,15;	agree (3) 6:20;88:22;	ambulance (1) 96:20	argue (4) 20:19;80:14;
According (3) 132:24;139:5;	182:24	189:4	Amelia (2) 6:11;95:22	103:19,19
186:5	adequate (2) 57:9;162:6	AGREED (5) 2:3,9,15,21;25:8	amount (6) 25:4;187:22,23,	arguing (4) 21:13;22:24;
accounts (1) 151:1	adjoining (3) 121:10,14,15	agreement (1) 66:2	24;188:1,2	54:13;110:16
accurately (1) 7:22	adjourned (1) 39:15	ahead (3) 40:17;103:11,11	angle (2) 74:14,15	argumentative (1) 46:18
accused (1) 114:7	Admits (1) 155:17	ailments (3) 182:4,8,11	angry (1) 117:21	arm (25) 25:14;26:20,22;
ache (1) 56:2	adult (6) 12:25;13:2,3;	ain't (22) 43:15;51:7;	ankles (5) 28:17,22,23,24;	32:23;53:1,12;
acknowledge (3) 48:15;90:25;	14:6,15;24:4	61:17;85:16,17;	103:22	56:22;57:2,5;67:3;
156:4	adults (3) 12:16,18,19	86:6;91:16;103:23;	anticipate (2) 8:6;12:8	70:24;85:20,25;
acquire (1) 186:21	advised (5) 6:13;58:15;	143:5;149:10;	antidepressants (2) 158:23,24	86:20,24;87:7,9,10,
acro (1) 93:2	136:23;137:2,7	151:23;152:3,4,5,	anti-psychotics (2) 158:20,21	12,12,15;88:2;
	affect (1) 9:6	159:2;184:21,21;	anymore (3)	103:11;156:19;
		186:8;187:8		164:8
		Al (1) 54:17		arms (12) 18:1,5,6,6;56:19;
		Alabama (4) 2:7;5:2,7;6:7		69:11;85:22,22;
		alert (1) 156:8		99:5;180:11;181:6,
		Alexis (1) 15:1		7
		alias (1)		arose (1) 10:23
				around (32) 8:7;33:4;47:14,
				15;59:4;64:11;

65:10;66:11,13; 68:13,14;69:24; 86:4,5;89:1; 103:23;125:13,15; 126:5;127:19; 131:13;133:20; 136:12,13;141:16; 143:5,5;153:8,9; 167:10;176:22; 180:6 arrest (1) 21:24 arrested (1) 138:10 arrived (1) 60:22 arthritis (1) 181:25 Arthur (2) 14:9,9 articulated (1) 138:5 articulating (1) 184:5 Ashley (7) 6:14;34:14; 35:13;57:21;87:4; 153:19;188:21 aside (1) 43:11 ass (3) 124:18;143:3; 147:4 assault (13) 19:5;20:12; 22:14,17;30:6; 157:14,18;158:2,4, 8;172:11,12,19 assaulted (9) 33:7;38:17; 42:12;120:12; 172:16,17,21; 183:19,19 assaulting (3) 171:21;172:9,10 assign (2) 2:18;46:6 assigned (2) 46:8;99:15 assistance (1) 18:14 assistant (5) 63:12,17,22; 64:3,24 associate (1) 147:3 associated (1) 170:13 Associates (1) 5:6 assume (1) 104:14 assuming (1)	38:9 Atlanta (15) 6:8;13:4,7,23,24; 16:13,16,19;19:3; 133:20;149:14,17, 21;150:3;153:7 attached (1) 125:7 attack (1) 173:5 attempted (2) 80:1;171:7 attempting (1) 186:18 attended (1) 15:9 attention (9) 57:5,9;65:16; 78:6;85:6,7,11,18; 184:11 attitude (1) 109:22 attorney (12) 8:14;119:6; 129:21;130:20,22; 131:4;144:3; 177:24;178:3,6; 182:7;188:8 attorney's (3) 129:19;148:25; 177:16 attributed (2) 64:2;76:11 audible (1) 7:13 August (3) 119:11;144:22, 25 automated (2) 132:6,11 avail (1) 140:2 available (1) 150:9 aware (38) 44:8,8;46:5;55:8, 10,14,18;66:20,21; 67:13,13;90:9; 114:16;129:24; 132:21;134:14,22, 24;135:10,12,12, 14,20;136:24; 137:3;138:12; 139:9,11,12,13,14, 15;140:4;142:17, 18;156:6;160:6; 170:10 away (27) 28:14,15,16; 50:2;52:2,2,19; 53:15;101:9,10,21, 21;103:2,3,12,12, 19,20;129:1,3;	130:10;142:6; 149:16,19;187:2,3, 21 awe (1) 101:17 awkward (1) 54:16 awoke (1) 53:24 B B&L (1) 16:16 baby (5) 72:24,25;75:10, 11;143:1 back (78) 11:13,14;12:1,8; 17:12,13;18:20; 21:1;22:8;26:19; 28:17;29:14;31:14, 18,21;32:20;34:3; 35:21;36:21;38:6; 42:17;47:13;49:15; 50:13;51:3;54:13; 58:9,19;64:17,18, 19;70:17;71:12; 77:2,2;79:21;80:2; 82:23;83:2;89:1; 92:13;98:3;100:7, 8,10,11;101:11; 102:3,25;111:18; 119:15,16;123:25; 124:9,13;130:17, 20;133:4;138:18; 143:20;146:11,14; 157:1,3;170:12; 171:9;175:7; 176:24;177:2; 179:13;181:13,15; 182:3;186:14; 187:8,8,10,14 Background (2) 38:3;148:14 backwards (1) 129:5 bacteria (1) 76:22 bad (7) 28:8;82:1;86:11; 129:9;174:1,2; 184:9 badge (1) 30:3 badly (1) 173:25 Bain (1) 5:6 bar (4) 16:8;17:12; 36:11,11 bartending (1)	16:6 based (3) 45:6,19;162:4 basically (3) 18:21;27:2;98:3 Bates (16) 35:19,22;37:15, 16;39:9;43:18; 119:8;153:11,15, 20;160:3,16,23; 161:6,15;168:22 bathroom (1) 58:8 bathrooms (1) 129:1 battery (4) 20:20;21:12,23; 22:13 beat (10) 48:12;62:17; 80:20;99:1,24; 123:2,23;138:15; 148:11;149:2 beaten (1) 48:8 beating (9) 22:24;59:25; 60:1;83:11;84:8; 100:1;122:1;128:4; 184:10 became (2) 135:20;138:12 become (3) 6:3;134:14; 135:14 bed (2) 141:16;164:9 Bedrest (1) 97:2 beforehand (1) 88:7 began (5) 16:9;85:5; 103:13,13;172:25 beginning (5) 5:7;65:24; 122:14,22;182:3 Behavioral (1) 154:12 behind (19) 24:15;25:14; 28:17;29:14;31:21; 50:13;51:1,2,3; 52:10,13,14,14,15; 71:15;98:3;100:8; 122:10;124:11 bend (1) 56:3 benefit (1) 47:2 bent (1) 129:5 best (3)	8:14;95:20; 128:24 better (2) 181:14,17 beyond (1) 59:7 big (3) 25:7;54:15; 80:13 bigger (1) 35:10 bike (5) 133:19,22,23,24; 134:3 bingo (2) 129:6,8 bipolar (6) 117:17,22;118:8, 10,17;160:1 birth (4) 114:24;115:20; 116:20;117:1 birthday (3) 9:25;116:24,25 births (4) 115:1,19;116:15, 18 bit (5) 27:6;30:21; 158:1,16;181:14 bitch (9) 29:18,24;48:22, 23;49:1,9;50:24; 143:3;147:4 bitty (3) 127:6;177:3,6 black (12) 16:18;26:16; 52:7,7;60:23; 62:14;72:8;113:1; 128:23;140:18; 184:25,25 blacked (1) 124:9 blah (26) 23:3,3;29:13; 55:25;61:23;123:6; 131:8,8;136:14,16, 16,16;143:11,12, 19;145:15,15,16; 148:12,12,12; 151:23,23;183:14, 16,18 Blank (3) 28:15,15;34:25 blase (17) 23:2;29:13; 55:25;61:23;123:5; 131:8;136:14,16; 143:11,12,19; 145:15;148:12; 151:22;183:14,16, 18
---	---	---	---	--

bleeding (2) 124:15;156:17	boys (1) 148:11	bunch (4) 14:4;32:19; 153:1;168:20	21:63;21:65;8; 68:15,25;78:2; 82:23;85:2;87:1,2, 6,17,23;88:1; 90:22;95:12,24; 113:3;115:1; 118:11;119:3; 121:19,19,20; 127:24;128:7; 130:5,16;131:9; 132:1;135:11,21; 137:25;146:19,22; 150:10,24;153:19, 21;154:2;156:21, 24;159:7,8;162:2; 163:10,23;167:5, 10,11;169:5,22; 171:15,16;176:14; 177:4;180:21; 185:6;188:13; 189:10,15,22,25	catching (1) 167:23
Bling (5) 125:22,23,23,24, 24	break (13) 8:5,8,10;17:8; 58:5,7,15;87:12; 88:15,18;95:21; 163:24;167:8	burning (2) 26:22;27:21		cat's (1) 61:17
block (1) 30:14		bus (1) 167:23		caught (1) 55:24
blood (6) 62:23;124:16; 158:8,9,9,10	breakage (1) 26:20	business (1) 149:1		cause (1) 5:9
bluff (4) 152:14,15,16,23	breaking (2) 164:25;182:17	busted (4) 77:20,23;78:8,19		caused (1) 181:21
body (11) 17:4;122:1; 164:3,5,15,25; 170:21;171:2; 181:5,21;183:3	bricks (2) 22:25;23:2	butt (1) 124:18		causes (1) 25:14
bodyguard (1) 123:1	brief (4) 15:24;58:13; 88:24;163:25	button (6) 98:1,2,5,6,7,20		celebrate (1) 116:24
boggled (3) 152:20,21,24	bring (5) 27:23;43:15; 70:16;143:11; 150:2	buttoned (3) 98:16,17,18		cell (8) 31:11,12;60:23, 24;69:5;144:16; 175:5;184:24
bogus (1) 153:3	bringing (1) 190:3	buy (1) 133:22		centimeter (2) 127:11;156:15
bone (15) 26:25;28:5; 56:23,24;82:25; 83:4;93:13,15,17, 18;94:1,3,10,16; 102:6	brings (1) 100:11	buying (1) 133:23		centimeters (3) 127:6,7,11
bones (4) 27:10;92:23; 164:20;166:18	broaden (1) 168:17	C		Central (1) 6:2
bone's (1) 28:4	broke (7) 32:23;38:15; 53:12;62:3;65:12; 127:18;156:19	cahoots (2) 46:11,15		certain (6) 105:16;121:7; 130:24;156:21; 174:14;180:12
booked (6) 9:20,20;25:20; 108:20;109:7; 110:2	broken (26) 26:25;27:10; 56:2,2,21,22;57:5, 5;70:24,24;71:4; 82:25;83:4;85:25; 86:20,24,24;87:7, 10,12,15,16;164:3, 16,20;171:2	call (10) 48:23;70:10,10; 152:7,10,10,11,13; 153:2;180:13		Certainly (3) 34:16;95:16; 189:14
booking (2) 78:10,12	brought (4) 57:5;69:23;70:7; 100:17	called (8) 13:13;47:19; 48:22,24;128:5; 148:10,13;151:21		certify (1) 5:3
boots (2) 183:9,9	brown (6) 112:18,18,20; 113:1,2,5	calls (4) 23:5;24:25; 152:5;153:3		chains (4) 17:21,24,25; 171:12
born (1) 127:1	brower (5) 35:8,11;36:11, 17,20	calm (3) 27:17,19;128:6		chair (5) 26:23;27:4,7,7, 17
both (11) 8:1;14:22;15:2; 21:25;30:16;84:15; 91:5;117:15;121:8, 8;157:20	brutality (1) 39:13	came (45) 5:5;15:15;16:7; 21:1,12;22:23; 26:16;31:11,12; 37:22;49:24;50:25; 51:2;59:23;62:13, 22;68:20;73:18; 75:11;77:19;78:5, 21;86:4,5;96:17; 104:7;115:16; 127:13,14;132:15; 136:12,13;138:7,9; 142:25;145:20; 150:16,18;151:3; 155:2;157:19; 158:25,25;159:19; 174:3		chance (4) 62:7,10;88:16; 130:11
bottom (2) 100:5,5	buddies (1) 124:7	Can (86) 7:5,14,22;11:25; 15:23;17:2;34:15, 15,23;35:9;39:5; 41:9,12;46:19; 56:24,25;57:20,21, 23;58:3,5,7;60:8,		change (8) 23:7;27:25; 28:12;101:25,25; 139:21;143:6; 184:13
bowel (1) 156:13	building (4) 41:9;105:23; 106:14,15			changed (1) 23:8
box (14) 135:3,11,12,13, 14,17,20;137:5,17, 24,25;138:6;141:3, 7	bulge (4) 102:5;127:9; 186:7,8			changes (1) 16:25
boxing (1) 62:10	bullying (2) 27:14,14			changing (1) 17:1
boy (4) 61:3;117:12; 143:4;147:4	bumped (1) 21:16			charge (10) 19:5;24:2; 138:21;157:13,23, 24;158:2,14,16; 172:12
			cancer (6) 10:9;15:15; 22:21;157:15,22; 159:2	charges (3) 19:6,7;20:11
			captain (2) 158:12,13	chart (2) 162:5,6
			car (10) 17:22;19:12; 22:24,25;23:2; 152:18;164:9,9; 181:17;186:25	Check (5)
			care (13) 21:4;57:17;70:4; 86:11;97:1,2; 154:11,13,17; 155:13;157:22; 159:23,24	
			careful (2) 61:6;169:20	
			carpal (2) 180:18,19	
			carried (2) 31:10,11	
			cars (12) 16:17,20,21,21, 24,25;17:13,23; 145:24,24;164:6; 186:25	
			case (21) 13:9;20:9,10,16, 17;21:1;22:13,20; 24:9;36:2;78:3; 130:1;139:25; 145:2,3,7;146:25; 150:5,5;178:19,25	
			cast (10) 167:4,7,9,9,10, 12,16,18,21,23	
			cat (1) 5:20	
			catch (1) 109:17	

83:12;92:12; 143:16;150:20,21 checked (2) 70:8;143:16 checking (1) 109:7 chemo (1) 15:16 chest (1) 155:23 child (5) 13:2,3;14:6;24:4, 5 children (8) 12:14,15,25; 13:18;24:3,10; 75:24;153:8 Childs (4) 43:15;48:2;54:4, 7 child's (1) 14:15 Childs's (2) 40:25;47:20 chipped (3) 80:22;173:25; 174:1 chopsticks (1) 62:19 church (2) 152:16,24 circle (1) 89:1 circumstances (2) 24:15;177:14 citation (4) 19:16,18;22:6,7 City (7) 10:3,14,15,17; 12:2;14:11;16:17 Civil (5) 5:4,19,25;19:10; 115:1 claim (1) 168:16 clavicular (1) 93:2 Clayton (9) 13:15;14:2,13, 13,14,15,19,22,23 clean (2) 113:5;128:25 clear (2) 99:8;156:11 clearly (8) 7:19,21;43:8,14; 46:1,13;47:5; 169:11 client (5) 63:4;80:17,20; 189:11;190:5 clients (4) 7:3;77:10;80:8;	150:13 clinic (7) 69:4,22;154:11; 184:14,16,18,20 close (3) 103:6,7,7 closed (1) 84:13 cloth (1) 61:9 clothes (9) 31:12,20,22; 97:24;99:18,25; 100:14,16;101:2 Cobb (2) 6:9;13:15 Coca-Cola (2) 106:14,15 Coffee (2) 128:20;129:8 cold (1) 61:13 colleague (1) 58:17 colleagues (1) 6:10 collect (2) 18:11,13 College (3) 14:24;15:9;16:6 colon (1) 92:24 color (1) 53:21 colors (1) 160:15 combative (6) 60:3,7,8,10; 110:24;140:24 comedian (1) 47:25 comfortable (1) 130:13 coming (12) 31:6,7;49:14; 52:8;75:10,12; 89:20;98:17; 115:14;142:24; 145:15;146:14 command (1) 59:24 commanding (1) 136:9 commenced (1) 26:20 comment (1) 49:2 commented (1) 122:8 commissary (2) 138:19,20 Commissioner (3) 2:6,22;5:3	common (1) 7:18 companies (1) 16:19 company (4) 19:21,22,23,24 compare (1) 159:7 compared (1) 28:6 complained (2) 86:1;182:9 complaining (1) 169:2 complaint (17) 74:6,7;77:10; 80:8,16;85:24; 135:2,3;140:21; 168:12;170:1; 171:14,15;172:7; 173:16,17,20 complaints (6) 86:17;134:25; 140:22,23;155:15; 182:4 complete (2) 169:18,18 completely (2) 8:3;122:11 compliance (1) 2:12 concern (2) 89:6;93:15 concerned (1) 184:23 concerning (3) 92:25;96:6; 178:18 concisely (1) 7:21 condone (1) 39:13 conference (1) 6:5 confidence (1) 130:23 confinement (19) 68:6;70:15,17; 86:3;174:6,7,8,10, 13,21,22;175:10, 15,18,20;176:4,9, 12,19 confirm (1) 55:20 confused (2) 12:3;179:4 confusing (2) 67:6,7 congregate (1) 177:8 congregating (1) 177:6 connected (4)	145:2,3;146:25; 149:25 connection (2) 111:25;112:4 consciousness (1) 49:15 consent (1) 154:13 considered (1) 74:16 conspiracy (3) 47:10,12;130:16 conspired (1) 144:7 conspiring (1) 143:24 contact (10) 52:4,8;59:23; 78:21;97:15,15; 105:5;149:13; 155:2;175:19 contend (1) 168:10 contendere (6) 20:24,25;23:10, 11;133:15,16 contenderes (1) 23:13 contents (1) 34:14 continue (4) 107:22,23,24; 123:4 control (3) 85:1,3;187:6 conversation (3) 61:17;151:15; 166:23 cooperating (3) 177:18,19;178:4 copy (5) 132:12;141:24; 142:1,2,2 corner (1) 180:6 corrected (2) 71:13;167:1 correction (1) 46:24 correctional (1) 129:8 corrections (1) 42:6 corridor (2) 121:9,24 corroborating (1) 79:19 counsel (11) 2:4,17;5:5;6:5,8; 15:9;37:13;58:15; 153:12;166:1; 167:25 counted (1)	101:9 counties (1) 14:5 counting (1) 84:10 countless (2) 147:8,11 County (23) 5:19;6:9;13:15, 16;14:2,13;24:16; 106:25;128:20; 129:8;130:8; 131:19,20,24; 134:7;135:19; 137:15,16;138:3; 139:4,5,20;177:16 couple (7) 19:5;60:24;89:1; 94:23;167:14; 183:1,2 course (5) 16:19;17:17; 20:24;26:23;30:10 Court (57) 2:13;5:1,22;6:7, 16;7:14,22,25; 14:9;20:25;21:6, 10;23:7;25:8,20; 26:5,5;37:17,18,20, 23;38:7,10,14,18, 19,23;39:2,4,10,17, 19,20;42:9,10; 43:5;87:18;100:17; 109:18;111:3; 114:1,11;115:7; 116:11;120:2,4,9, 20,24;122:17,21; 131:10,12;146:21; 150:2;157:19; 183:20 courthouse (4) 25:9;26:6; 106:10,12 courts (1) 149:4 cover (2) 6:18;83:10 covers (1) 14:4 coward (2) 30:2,3 cracked (1) 131:16 crawl (1) 97:7 crawled (1) 97:7 craziness (1) 62:24 crazy (5) 62:24,25;152:3; 155:4;181:12 created (1)
--	---	---	---	---

129:6 creates (1) 18:7 credible (2) 79:2,7 credit (2) 15:19,20 credits (1) 15:22 criminal (3) 19:7;129:19; 178:18 crooked (2) 65:14;80:21 cruelty (2) 24:3,10 crushed (5) 30:20;64:12,14; 74:24;76:7 CSR (1) 5:1 CST (1) 5:8 cube (1) 105:25 cubital (2) 180:19,19 cuffed (1) 100:4 cure (2) 118:11;159:9 curious (1) 169:9 current (3) 10:2;24:14; 155:18 currently (4) 5:21;10:5;12:6; 171:1 cuss (2) 103:19,19 cussing (5) 29:13;30:22; 48:15;62:9;123:6 customers (1) 170:19 cut (8) 18:17,18;21:14; 148:23,24,24; 186:12;188:24 cuts (7) 38:20;56:19; 57:3;67:3;85:22; 154:5,7 cutting (4) 28:24;29:1; 32:15;103:22	147:16 daddy (1) 117:14 damage (3) 73:18;174:3; 184:25 damages (8) 65:19;168:10,16; 170:3;179:14; 184:4;187:13,18 damaging (1) 167:11 damn (3) 75:9;143:18; 150:22 dark-skinned (3) 33:4;155:3,4 Darryl (3) 144:13,14;151:5 Darryl's (2) 149:22;151:2 DA's (3) 146:16;177:18, 20 date (25) 5:3,25;21:6,10; 22:8,8;25:17,18; 37:8;88:15;95:13; 106:16;112:11; 113:22;115:1,19, 20;116:15,17; 117:1;119:11,11; 144:21;154:15; 178:13 dated (1) 92:21 dates (4) 37:19;39:20,21; 116:20 daughter (2) 22:24;24:2 Dauphin (2) 2:6;5:6 David (3) 63:12,23;66:15 day (25) 2:7;37:23;42:17; 47:3;54:24;60:12; 63:11;66:2,3,11; 67:23;86:15;96:20; 108:20;113:16; 115:11,12;117:23, 24;129:6;137:6,20; 143:14,15;187:19 days (7) 25:9;59:3;94:24; 109:15;110:1,23; 136:25 dead (1) 181:6 deal (6) 57:25;86:12; 119:3,4;128:2;	129:14 dealt (1) 119:4 Dean (1) 14:16 death (1) 148:12 deceased (2) 13:19,21 deception (1) 162:12 deceptions (1) 162:17 decision (1) 170:21 declined (3) 118:14;130:3; 153:2 defendant (1) 19:10 defendants (1) 6:15 defending (1) 157:18 define (2) 125:6;176:12 defined (1) 92:19 definite (1) 162:7 definitely (1) 118:4 definition (2) 172:11;175:17 deformity (1) 156:8 defying (1) 102:9 degree (1) 74:15 deliveries (1) 16:25 demand (1) 27:13 demeanor (1) 109:22 denied (2) 171:8,11 denies (1) 155:22 dense (1) 148:3 Dental (2) 154:12,16 dentist (9) 64:15,16;68:16; 76:19,24,25;79:20, 25;155:18 deny (2) 72:12;171:10 department (7) 39:11;41:1; 54:25;66:7,8;	82:20;133:18 departments (1) 130:15 depends (1) 15:21 deponent (19) 26:24;58:1,3,5,8; 95:15,18;131:10; 144:1;162:1,9,14, 24;163:5,17,21; 168:3;178:5; 190:10 deposition (15) 2:5,10,11,19,22; 5:17,23;6:4,19;8:6, 9,20,23;96:5; 166:22 depositions (1) 2:14 depressed (3) 159:1,6,6 depression (7) 78:4;117:8,13, 15;118:17;127:23; 159:19 deprivation (1) 85:10 deprived (2) 85:6,9 Deputies (12) 6:16;26:16;46:6; 74:2;83:24;89:6; 97:22;98:24;101:7; 112:7;123:8;130:8 deputy (19) 25:14;35:15; 40:18;42:2;43:3; 73:23;84:3;89:25; 90:4,6,6;91:4,12, 12,21;106:25; 112:19;129:21; 178:3 deputy's (1) 112:13 describe (2) 112:10;113:4 description (1) 16:24 desk (6) 28:2;32:5;89:13; 90:7;102:4;178:25 despite (1) 44:5 detail (1) 17:3 details (1) 150:25 detector (10) 44:17,21;45:10, 23;46:25;47:12; 83:25;84:2;161:16, 18 detention (1)	42:2 devices (1) 89:4 diagnosed (6) 57:10;117:5,17; 127:23;128:3,13 diagnosis (3) 93:23;128:11; 159:12 dial (1) 150:18 die (5) 117:9,14,14,14; 160:1 died (5) 93:12;117:8,11, 11,23 difference (2) 80:13;135:22 different (13) 37:19;39:20,21; 53:22;61:8;62:13; 66:10;67:22;68:19; 89:4;117:21; 153:15;173:2 difficult (3) 7:25;89:5;162:5 difficulties (1) 146:20 difficulty (3) 91:10;120:19; 161:3 digit (1) 156:16 dilemma (1) 114:18 dinner (1) 89:21 direction (1) 181:16 disagree (1) 33:21 disappears (1) 124:3 disassociated (1) 19:2 discharged (2) 43:21;44:6 disclose (1) 189:10 discovery (2) 37:13;43:22 discuss (1) 131:18 discussed (2) 22:13;188:6 discussing (2) 54:23;59:5 discussion (2) 92:16;96:2 disgust (1) 31:25 dishwasher (1)
D				
DA (8) 143:18;145:7,11, 13,14;146:11,12;				

17:12 dismissed (1) 20:22 disorder (1) 117:17 disparage (1) 139:24 dispatcher (1) 153:3 Disposition (1) 154:9 distress (4) 56:20;69:13; 154:5;156:8 District (11) 5:22,22;14:4; 129:19,21;130:19; 22;131:3;148:25; 177:16;178:3 dizziness (1) 155:23 dizzy (3) 96:15,15,18 DJV (1) 16:17 DMV (1) 19:13 DOC (1) 179:15 doctor (7) 63:11;76:2;86:9; 182:14,16;184:3; 186:23 doctors (1) 56:3 document (13) 34:15;36:15,20; 73:15;136:2; 140:13;156:3; 160:23,25;161:9,9; 163:16,20 documentation (1) 156:4 documents (7) 8:22,25;37:2; 92:19;136:1;188:6, 9 dollar (5) 187:22,23,24,25; 188:2 dollars (1) 151:17 Donald (1) 15:1 done (5) 17:19;52:12; 69:7;151:10; 153:17 door (10) 107:5,11,24; 108:1;135:17; 136:18;138:16,17; 151:21,22	doorway (4) 52:21;121:6,7,9 dorsal (1) 156:16 doubt (1) 136:18 doubts (1) 169:22 down (120) 7:14,21;8:1; 10:11;15:5,15; 16:7;20:19;25:21, 22,22;26:10;27:6, 18;30:20,21;31:12, 14,17;32:22;35:23; 38:24;39:5,8; 49:23;50:14;52:21; 53:8;57:8;61:22; 64:8,12,14;68:20; 76:7;80:14,23; 86:8;89:14;96:10, 13,15,16,17,22; 97:8;98:4,7;99:11; 100:8,10,10;102:3; 105:2,6;106:14,15; 108:24;115:18; 118:17;119:19,20, 22;120:9,10,16; 122:2,18,24;123:8, 9,11,15,17,22; 124:10,12;126:4,7, 8,21;127:1,3,4,6,9, 10,18;128:6;136:3, 4,5,6;138:13; 145:13;152:20,21, 24;154:10;155:12, 21;156:23,25; 157:1,19;158:12, 25;164:3,10,16,25; 166:19;171:2; 174:14;182:25; 183:8,10;187:11; 188:1,20 download (1) 37:4 downstairs (7) 61:2;66:9;67:8; 72:21;83:24;86:6; 97:14 drag (4) 29:3;49:19;60:1; 103:23 dragged (5) 52:24;119:14; 123:24;124:9; 173:1 dragging (13) 28:19,22;29:3; 47:23;49:11;50:8; 52:23;54:1,4,9; 171:19;172:7; 181:21 drags (5)	29:12;30:5; 122:11;124:8; 180:4 drastic (1) 184:12 dressed (9) 99:1,2,3,22; 100:24;101:1,4,7; 112:12 dress (1) 101:3 drive (3) 152:18,19; 186:24 driver (3) 152:25;153:2; 165:10 driving (1) 152:12 drop (1) 187:5 drug (30) 28:16;29:6; 38:12;47:23;48:3; 49:5,7,16;50:6,14; 51:4,22;52:3,9,19, 20;53:5,24;59:9, 24;99:16;100:13; 101:10,11;103:17, 21;121:23;122:14; 181:16,17 drugs (2) 9:5;25:23 DUI (1) 187:1 duly (1) 5:13 dummy (2) 152:5,7 during (15) 16:19;20:24; 43:1,1;68:4;72:2,4; 86:17;97:21; 119:14;131:19; 133:16,18;147:6; 173:5 duty (1) 48:11 dying (4) 22:21;157:15; 158:11;160:2	6:1;60:19 eat (1) 187:5 eating (2) 187:6,7 edema (1) 156:9 education (2) 154:8,8 effect (2) 2:12;138:13 effective (1) 62:5 eight (6) 16:12;43:21; 70:8,8;85:15; 185:16 eighty (1) 55:6 either (9) 19:10;30:17; 54:25;60:7;66:15; 94:13;148:21; 181:24;188:15 elbows (1) 164:11 electronically (1) 154:17 elevator (3) 104:5,11;107:25 elevators (1) 104:8 eleven (1) 113:17 else (11) 8:19;43:7;48:17; 49:10,10;59:7; 111:9;149:8; 168:24;176:20; 185:23 email (3) 71:18;143:12; 145:14 emails (1) 143:16 emblazoned (1) 112:21 emotion (2) 118:1,1 emotions (1) 117:22 emphatically (1) 80:12 employed (1) 171:1 employers (1) 165:9 employment (1) 15:24 employment-wise (1) 17:9 enamel (6) 64:10;65:10,10,	12,13;72:7 encounter (1) 155:13 encountered (1) 101:6 end (5) 47:2;54:24;93:4; 109:16;159:1 enjoyment (1) 30:8 enough (6) 136:17;153:7; 156:10;165:16; 175:5;186:21 entrance (3) 52:21;107:10,13 Enzell (49) 60:13,13;61:14, 17,21;62:6;63:14, 24;65:1,4,7,7;66:4, 14;67:22;68:1; 70:21;72:12,14; 73:8,15,15,17; 75:18;76:4;77:7, 18,18,21,22;78:3, 13,17,18;79:1,15; 83:6,9,10,20,22,23; 86:13;89:24;90:4, 20,24;91:1;97:11 escorted (1) 69:3 especially (4) 48:10;86:2; 138:20;188:9 essentially (1) 46:12 estimate (1) 132:2 estranged (1) 12:6 evaluation (1) 158:18 even (37) 17:14;22:21; 23:11,18;25:21; 30:14;43:15,17; 46:23,23;50:20; 52:5,6,7,8;54:22; 56:24;60:9;72:14; 79:2;83:17;86:14; 97:6;100:24; 108:13;111:21; 118:25;124:19; 127:7;129:6; 135:16;146:23; 152:7;161:17; 166:18;179:14; 189:16 everybody (17) 25:12;46:15; 47:9,12;91:13,17, 18;108:24;118:4; 149:19;152:2;
		E		
		earlier (13) 18:23;49:1;63:6; 64:2;66:11,25; 67:1;97:21;103:25; 160:4;164:1,24; 170:25 Earth (1) 163:9 Eastern (2)		

159:16;161:11; 175:25;176:3,8; 177:1 Everybody's (1) 116:23 everyone (3) 19:3;91:15;96:5 Everything's (1) 20:17 everywhere (1) 151:24 evidence (10) 2:20;41:22,25; 54:25;56:1;71:15; 79:19;80:18; 111:20;184:4 evulsion (4) 63:25;70:23; 155:16;156:9 exact (7) 21:7;68:15,25; 80:3;94:7;120:3; 130:14 exactly (9) 54:18;67:10; 79:8,10;120:5; 128:22;164:4; 165:21;174:16 exam (1) 154:6 examination (3) 5:9,16;154:4 examined (2) 5:13;63:23 example (1) 169:1 except (2) 2:16;6:21 excessive (2) 55:9,12 excuse (8) 25:7;37:10; 109:13;154:11; 171:18;180:18; 184:15;186:3 excuses (1) 25:6 ex-girlfriend (1) 11:2 ex-girlfriend's (1) 12:2 Exhibit (1) 153:11 existed (2) 132:22;135:13 exonerate (1) 55:21 exonerated (3) 55:9,14,20 expect (2) 83:2;150:14 expedited (1) 154:12	experience (2) 128:18,23 experiencing (1) 170:15 explain (8) 63:22;65:8;73:3; 14:101:19;125:16; 138:4,6 explained (1) 154:14 exposed (1) 31:23 express (1) 89:9 extend (1) 164:8 Extreme (2) 117:13,15 extremely (1) 29:1 extremities (1) 156:18 eye (5) 24:18,18;30:7; 105:21,21 eyes (1) 156:11 F face (25) 26:19;31:12,14, 17:41;10,11;48:18, 19:50;14;51:8,24; 54:12;64:10;84:19, 22;100:8,10,10; 119:16,17;122:2; 124:5,5,10,12 Facebook (23) 116:4,4,5,6,13, 14,17,19,21,25; 117:3;150:10,11, 12,15,17,17,18,20, 23,24,25;151:3 Facebooked (1) 134:2 faces (3) 28:19;42:22; 54:18 facial (1) 54:11 facilities (1) 133:2 facility (5) 25:20;70:11; 100:23;110:20; 175:13 fact (14) 45:7,18,19,25; 46:12,21,21;65:3; 80:14;94:7;105:15; 111:21;138:9; 185:8	failed (8) 44:17,21,21; 45:18,22;59:14,17; 163:9 failing (1) 47:12 fairly (1) 9:3 fake (11) 31:16;32:6,17; 39:24;42:14;47:18; 50:17,19;54:21; 84:4;148:12 fall (15) 7:17;95:14,18; 96:7,10,12,22;97:7, 8;124:4,20;125:6, 20;142:13;189:4 fallen (4) 124:25;125:1,22; 156:23 falling (6) 75:23;96:15,16, 17,22;125:25 falls (5) 95:11;124:6; 156:23;187:7,7 false (1) 41:19 familiar (4) 133:6;139:20,21, 22 family (3) 10:6,12;13:11 far (11) 11:25;15:12; 53:23;123:17; 127:4,5;152:12; 156:22,24;177:2; 181:11 fast (1) 7:20 faster (1) 34:23 father (7) 13:21;117:11; 118:5;157:16,20; 158:12;159:20 fat-lipped (1) 39:2 fear (2) 153:8,8 fearful (1) 128:7 fears (1) 128:1 Federal (2) 5:4,25 feed (1) 176:22 feel (16) 17:24;51:21; 103:15,15;117:23,	24;118:6;130:13; 157:10;180:11,21, 21;183:11;184:9; 185:15;187:8 feeling (3) 17:18;117:21; 181:4 feels (4) 181:6,14;183:12; 187:9 feet (13) 29:15;30:12; 49:7,11,16;50:7,8; 51:3;84:15;97:25; 99:4;103:18; 119:15 fell (5) 31:18;95:2; 124:7;125:24; 126:1 felt (2) 103:11;187:9 female (2) 31:19;181:9 few (6) 28:25;94:24; 127:5,7;178:14; 180:20 fifteen (6) 12:18,18,25; 25:9;59:3;136:25 fifth (1) 156:16 fight (16) 30:1;50:15; 54:14;57:7;66:22, 23;68:1;72:5,15; 77:18;86:6,10; 123:7;138:21; 155:15;175:12 fighting (4) 62:11;78:8; 123:9;157:16 fighths (1) 110:21 figure (4) 116:13,17;117:1; 163:2 figured (2) 115:25;159:5 File (8) 5:20;64:7;127:3, 10,11,19;134:21,23 filed (4) 7:2;80:16;127:4, 6 filing (1) 2:22 Filipovits (60) 6:6,12,20,23; 34:13,18,21,24; 35:3,7,12,18,25; 36:6,10,16,23;	46:17;57:20;58:2, 10;71:17,21,25; 72:3;87:4,6;88:2,3, 10,14,20;93:21; 144:5;153:19,22; 161:20,23;162:2, 10,16,19;163:1,10, 13;166:21;168:5, 25;169:4,12,17; 178:7;188:21,23; 189:1,9,13,15,24; 190:6 fill (1) 136:17 filled (1) 137:4 finally (4) 25:1;27:22; 28:12;30:19 find (9) 60:6,9;95:21; 119:10;141:7; 142:23;183:11,13; 184:4 findings (2) 154:5,7 fine (4) 25:25;58:12; 157:9;168:17 finger (2) 21:14;186:13 fingers (2) 180:17,20 finish (4) 7:24;8:3;102:17; 126:25 fired (2) 45:4;145:18 first (29) 5:13;6:21;9:2; 29:16;32:6;33:5; 42:18,23,25;49:8; 59:23;65:15;79:2; 83:17;98:14;101:6; 111:2;122:7; 135:14,18;144:9; 146:23;158:24; 161:12;162:24; 163:6,8;164:2; 188:18 fist (1) 84:13 fit (2) 103:21;127:8 five (8) 60:23;113:8,8,8; 132:3,4;134:19; 139:6 fix (3) 166:16,16,17 fixed (1) 19:23 Fixodent (1)
---	--	--	---	--

124:8 flawlessly (1) 9:3 flexing (1) 18:2 floor (34) 32:23;37:23; 50:6;65:5,8;66:19; 68:2,20;79:12,14, 15,19;85:17;86:2; 89:19;135:23,23, 24;136:9;137:24; 138:16;140:9; 174:6,19,20,21; 175:9,25;176:4,8, 13,13,17;177:1 floors (1) 86:2 Florida (1) 12:21 Flying (1) 160:14 focal (1) 93:3 focus (1) 139:18 follow (1) 150:7 followed (3) 133:20;152:4; 153:6 following (4) 5:9;133:20; 148:22;153:4 follows (2) 5:14;6:25 follow-up (2) 188:6,9 food (1) 138:18 foot (9) 124:4;156:15; 167:4,9,12,16,18, 21,23 force (5) 2:11;55:9,12; 101:13;177:14 foregoing (1) 5:5 forget (2) 128:5,9 form (11) 2:17;6:21;18:13; 46:17;136:4;137:4; 141:4,13;142:16, 18;162:6 formation (1) 116:7 forms (1) 137:18 forty-eight (1) 71:9 forty-five (1)	74:15 Forty-four (1) 9:24 forward (6) 6:19;51:24; 101:4;129:25; 179:1,3 forwarded (1) 143:10 found (6) 89:2;92:15; 115:22;142:19,21; 169:9 four (24) 8:7;15:9,12; 33:12;34:5,9,11; 35:17,24;39:23; 40:13;49:24;60:23; 81:25;82:4,6; 114:20;126:11; 173:11,15,19; 174:3;178:15; 179:14 fourteen (1) 59:3 fourth (1) 173:24 fracture (5) 92:24;94:5,6,8,9 fractured (2) 87:15,17 frame (2) 113:20;146:4 frames (1) 113:13 Frank (23) 41:1,2;44:10,11, 13,13,14,19,23; 50:19;69:4;100:9; 116:3;143:23; 148:8,13,13,15,19; 151:6;160:13,13; 162:15 friends (1) 10:6 front (21) 21:20;51:2; 52:16,17;61:22; 81:24;87:5;89:3; 97:19;113:21; 118:11;122:9; 149:10;152:18,19, 19,23;156:9; 172:25;173:3; 186:3 frustrated (1) 25:1 fuck (1) 61:25 fucking (2) 143:4;147:4 fuel (1) 16:25	full (2) 2:12;9:9 Fulton (15) 5:19;24:16; 106:24;130:8; 131:19,20,24; 135:19;137:15,16; 138:3;139:4,5,20; 177:16 Fuqua (97) 29:9,11,21,23; 31:16;32:6,17; 35:15;37:11,19; 38:9,16,19,25;39:3, 8,22,24,24;40:12, 14,18;41:4,4,7,8, 14,20;42:4,8,14,14, 16,19,20,20,21,24; 43:4,4,5,6,16,17; 44:12,12,14,20,20, 23;45:2,17;46:4, 12,25;47:4,19,22, 48:4;50:18,19; 84:4,5;104:1,8,8; 106:1,2;109:1,3,7; 110:1;111:16; 112:10,24;113:3; 114:9,12,13,14,21; 115:4,16,25;116:1, 4;119:16;120:13; 122:6;123:25; 124:11;133:17; 135:16;143:10,19, 23;188:10 F-u-q-u-a (1) 32:8 Fuquas (2) 114:10,12 Fuqua's (13) 38:13,21,21; 40:11;41:7;42:4; 43:20;46:14;47:18; 117:1;133:19; 134:1;163:11 FURTHER (7) 2:9,15,21;27:6; 39:12;69:6;190:10	21;108:6;110:6; 115:19;129:1; 134:7;141:20; 142:4;151:6;160:9; 167:4,12;184:11 gavel (2) 115:12,18 GBI (7) 161:7,7,8,9,9,10; 163:8 general (4) 56:20;69:12; 154:4;156:7 genitals (2) 187:16,16 gentlemen (2) 55:9;120:22 Georgia (10) 5:19,22;10:4; 12:20,22,22,24; 13:20;14:7,20 gets (4) 28:13;122:10; 130:17;148:21 Gettier (3) 63:12,23;66:15 gift (1) 129:1 girl (3) 122:8;133:22; 134:3 girlfriend (2) 12:6;18:22 gist (1) 151:7 given (8) 102:8,12;131:21; 147:8;165:11; 167:21;185:3; 189:18 giving (9) 25:6;37:4;89:20; 140:8,16;142:6; 180:22;185:22; 186:14 glenohumeral (1) 93:2 globally (1) 139:19 glue (6) 64:8,9;126:5,8, 21;127:2 Gmail (1) 36:1 God (4) 118:10,12; 128:24;187:21 God's (2) 129:14;160:1 goes (5) 82:25;143:5; 144:11;154:10; 167:9	gold (26) 64:7,7,8;65:9,9, 9;81:13,14,15,17; 125:22,25;126:1,2, 8,15,16,17,18,19, 21;127:1,9,13,15, 19 golds (1) 126:9 good (10) 41:11;42:22; 82:13,15;93:1; 129:8;164:21,22; 165:9;177:20 googled (6) 115:24;116:2,3, 3,4,5 grabbed (7) 26:20;101:16,17, 18,20,22;102:24 grabbing (1) 101:19 grabs (2) 25:14;28:14 graduate (1) 15:10 Grady (30) 57:10,10,11,15, 15;71:1,1,3,4,6,7; 86:16;89:2;92:13, 15;127:22;159:11, 17,18;165:12,19; 180:16,16;182:2,5; 185:23,25,25,25; 186:15 Grand (2) 131:8;143:5 grandfather (2) 10:9;15:5 grass (1) 18:17 green (1) 62:15 grew (1) 62:10 grievance (30) 133:7,10,11,17, 18,25;134:4,15,21, 23;135:5,15,24,24; 137:18;138:3,4,11, 11,12,19,25;139:8, 12;140:1,4;141:10, 10,13;154:14 grievances (4) 140:8,16;141:24, 25 Grill (2) 17:12;18:9 gripped (2) 28:22,23 grips (1) 118:10 ground (13)
		G		
		gang (1) 62:23 gap (1) 156:23 gas (1) 133:20 gave (32) 22:6,7;23:9; 41:25;42:4;57:21; 59:24,25;65:5; 73:23;96:24;97:3; 98:22;104:16,19, 23;107:18,19,21,		

25:15;26:14,21; 51:11;53:12,20; 61:24;62:5;73:22; 76:10,21;80:15; 125:25 grounds (1) 2:18 group (4) 32:16,18;78:5; 175:4 groups (2) 128:7;177:6 grown (1) 172:9 guard (2) 31:19;141:19 guards (2) 141:16;142:6 guess (8) 8:15;21:18;27:3; 29:25;31:24;105:8; 166:16;182:23 guilty (2) 22:16;23:14 gums (1) 125:18 gun (2) 62:4;97:16 guns (1) 133:3 guy (62) 28:2,13,22; 31:15;32:25;33:1, 4;38:17,19;39:2,3; 40:11;41:3;42:3; 50:2,2,5,11,15; 51:1,25;52:19; 53:4,13,14,14,16, 19,20;54:17;60:25; 61:7,15,16,18; 62:11,22;66:22,24; 85:13;86:3,14; 102:4;115:23,24; 116:8,13;123:22; 128:24,25;131:6,7; 143:7,8,18,23; 146:11;147:1,2; 148:16;151:11; 175:6 guys (13) 50:17;52:8; 59:23;60:23,23,24; 71:18;103:14; 119:19;120:8; 130:4;143:11; 177:23	half (14) 15:19,21;31:12, 20,22,22;60:24,25; 98:19,19;122:1; 146:24;180:21,22 halfway (2) 151:14,15 halls (1) 52:21 hallway (5) 27:5;104:4,7; 106:3;109:17 hand (11) 26:15,17,18; 51:16,19;84:14,21; 122:4,23;124:5; 164:12 handbook (3) 131:21;132:5,22 handbooks (1) 132:17 handcuffed (15) 28:17;29:25; 30:2,4,13;31:13,14, 16;48:11;99:5,6; 120:16;123:12; 124:10,12 handcuffs (12) 26:6;30:1,15; 41:3,3;48:13;50:3, 6,21;99:4;103:15; 123:5 handheld (1) 97:13 handle (2) 17:5;189:25 handouts (1) 18:21 hands (20) 25:12,13,13; 28:17;29:14;30:11; 31:20;41:13;50:13; 51:3;85:12;97:25; 98:3;100:8;123:14; 129:14;164:12; 172:10;179:16; 187:6 hanging (5) 81:10;98:4; 124:19;125:12,20 happen (7) 67:5,12;72:20; 95:19;110:19; 180:7;183:13 happened (36) 20:21;51:23; 52:15;61:2,16; 64:9;67:19;68:2; 72:21;78:15,20; 90:20,24;91:2,7,8; 106:20;108:20; 109:12;110:9; 115:3;129:4;141:4;	145:4,17,17; 150:19;153:6; 180:2;181:2,23; 183:1,14,18,19,23 happening (1) 57:18 happy (5) 117:23,25;118:5; 169:6;179:18 hard (5) 23:19;30:20,21; 84:7;164:12 harder (1) 29:18 hardest (1) 165:9 harm (3) 83:24;143:12; 151:10 harmed (1) 83:23 harm's (1) 84:11 hate (1) 129:2 hazard (1) 53:9 head (6) 7:16;51:20; 52:14;62:12,21; 72:10 headache (2) 155:22;185:12 heal (4) 27:12;71:3,10,12 healing (5) 97:1;117:25; 167:6;183:3,3 heals (1) 71:12 health (11) 57:25;117:5,7; 128:15,16;154:7, 12,17;158:18; 164:22;171:11 healthy (1) 157:9 hear (19) 7:5,9,22;94:4,11, 11;101:16;102:23; 103:1,5;118:20; 121:19,19,20,22; 151:14;154:2,21, 25 heard (8) 38:4;61:5;94:17; 131:7;133:5; 151:11;162:25; 170:19 hearing (12) 33:11;34:4,8; 39:22;40:18;42:16; 47:6;115:7;119:9;	14;129:20;161:13 heart (1) 156:11 heartbeat (1) 27:1 heavy (1) 183:9 height (2) 33:4;53:21 held (1) 122:24 hell (2) 62:10;145:22 help (7) 27:9;31:22;73:3; 144:5;157:5; 184:10;185:13 helped (1) 101:3 helping (1) 141:6 here's (8) 40:3,3;73:21; 85:23;114:18; 135:7;138:18,19 hesitate (1) 7:10 hey (14) 41:25;48:11; 52:22;85:4;86:5; 91:15;96:25;102:5; 124:6,7;151:22; 153:1;155:9;172:1 high (2) 16:4,5 higher (1) 42:8 himself (5) 41:5;47:5,7; 48:13;133:24 hip (5) 96:11;179:25; 180:2;181:13; 183:25 hips (1) 18:7 history (2) 15:24;155:15 hit (26) 16:7;26:21; 29:14,17;30:3,14, 15,18;50:4;51:13; 52:10,13;59:21; 62:1,2;64:10; 65:11;76:21;82:17; 84:3,9,11;122:13; 127:15;158:15; 172:13 hits (5) 29:18;30:19; 74:13;122:8;124:3 hitting (7) 29:13;30:12;	31:5;121:13;122:7; 123:15;124:17 Hold (20) 35:21;37:25; 58:2;67:6;68:24; 70:2;120:16,17; 123:22,23;137:12; 140:7,7;142:23; 144:3;166:6,6; 168:5,25;178:7 holding (12) 44:11;95:17; 119:19,20,21; 120:8;122:18; 123:8,11,15,16,17 hole (4) 86:12,13;177:3,6 hollering (3) 27:2,2;54:13 home (6) 6:9;15:16; 110:23;128:10; 149:11;167:23 honestly (3) 8:18;18:17; 130:7 Honor (3) 39:16;114:10,17 hook (1) 164:7 hooks (2) 164:7,10 hope (1) 187:2 hopefully (2) 7:12;9:3 horror (1) 72:11 hospital (13) 58:19;94:17,20, 22;96:14,18;157:3, 4;182:12;183:15, 24;184:7,7 hour (1) 17:2 hours (15) 8:7;15:20;17:15; 27:8,21;69:1,4; 71:10;85:15,15,18; 183:1,2;187:5,5 house (17) 11:15,20,24; 12:2,7,7,8;114:10, 12;143:9;145:19, 23;148:21;149:12; 151:14,15;152:3 housed (1) 175:8 huddled (2) 32:16,17 hugged (1) 134:3 Huh (2)
H				
hair (1) 53:21 haircut (2) 33:4;113:5				

81:4;112:16 hundred (1) 157:7 hundreds (2) 185:17,17 Hurricane (1) 16:7 hurt (6) 17:5;86:11; 157:6;181:12,12; 186:22 hurting (6) 17:7;28:7;30:22; 31:17,18;165:16 hurts (6) 71:14;91:16; 181:9,11;183:25, 25 husband (3) 36:22;157:24,25 hygiene (1) 154:8 hyper-extends (1) 180:5 hypervigilant (1) 128:8 hypotheticals (1) 172:6	20:6 important (1) 13:9 impossible (5) 42:5,8;140:9; 149:19;187:24 impressed (5) 178:20,22;179:5, 6,11 impression (2) 102:4;175:12 impressionable (1) 179:12 improper (1) 39:13 inability (1) 138:25 inaccurate (1) 120:11 inappropriately (1) 123:3 Inaudible (3) 40:2;79:9; 118:20 incarcerated (4) 20:6,8;22:7; 131:23 incarceration (1) 24:16 incarcerations (1) 131:19 incident (55) 10:23;31:9; 32:20,21;37:20; 47:13;56:8,14; 59:6;60:11,15; 61:1;63:24;64:2,9; 65:1,21;66:3,4,12, 14;67:3,20,21; 68:4,25;69:3,10; 70:21;73:7;76:4; 77:7,9;81:17;89:5, 24,25;90:4,4,20; 91:2,20,21;94:23; 96:23;97:10,22; 98:22;101:21; 154:20;164:21; 165:3;172:25; 173:23;181:4 incidents (1) 67:12 including (1) 9:5 inclusive (1) 161:4 inconclusive (12) 160:5,7,9,12,12, 13;161:10,13,24; 162:7,13;163:6 incorrect (2) 117:18;159:13 incorrectly (4) 71:11;120:10;	122:17;123:10 indeed (1) 123:23 indicate (4) 85:8;88:11; 92:22;155:23 indicated (8) 55:2;74:18;82:7; 95:1;97:10,21; 164:15,24 indicates (3) 43:20;92:23; 159:11 indication (2) 86:18,19 indications (1) 85:21 indigent (6) 136:17,18,24; 137:3,7,25 individual (2) 59:11;94:20 individuals (4) 35:24;53:22; 66:10;85:20 industry (1) 165:5 ineffective (1) 97:12 influence (1) 9:5 information (14) 8:1;35:24;96:4; 116:18,23;130:6, 17,17,20;136:3; 143:10;147:16; 151:4;154:15 initial (3) 32:21;66:1; 119:9 initially (3) 49:18;99:9; 189:16 initiated (3) 86:11;130:8; 154:11 injured (2) 26:11;95:4 injuries (17) 56:5;64:1;73:16; 89:22;91:13,14,15; 164:22;165:10; 168:12,14;170:4; 175:6;179:13; 182:18,19;184:4 injury (8) 25:15;93:17; 155:18;156:20,21; 164:11,13,15 inmate (13) 60:12;61:4; 131:21;132:5,17, 22;134:18;136:21;	141:18,18,19,23; 155:25 inmates (9) 31:25;78:10,11, 16,19,22;79:4,5; 110:21 inside (18) 21:16;26:25; 43:13;72:9;73:24; 74:1;75:3;81:8; 83:4;106:4;110:24; 122:1;127:16; 133:2;141:12; 150:4;175:12; 184:20 instead (1) 7:17 institution (1) 110:24 instruction (2) 102:9,11 insurance (11) 57:17;165:14,15, 20;166:3,4,9,10; 186:19,20,21 intake (15) 25:21,22;27:5; 38:12,14;67:11; 69:1;73:6,13; 100:8;119:15; 148:16,17;153:17; 154:15 intaked (1) 85:14 intend (2) 168:15;177:17 intentionally (2) 26:13,14 interacted (1) 33:6 interaction (3) 33:7;174:15; 175:2 interfering (1) 105:13 internal (1) 177:12 internet (2) 116:22,23 interpret (1) 183:21 interpretation (3) 119:24;120:3; 163:16 interrogatories (1) 15:8 interrupt (9) 44:1;51:18; 52:11;67:20;79:3; 80:11;102:16; 126:23;137:1 interruption (3) 120:20,24;	146:21 interviews (1) 147:9 into (47) 7:17;9:20;16:9, 23;19:13;21:16; 24:20;25:5,20; 28:23,23,24;29:3,6, 12,24;30:5;42:16; 45:13;48:3;49:5; 52:8,24;64:18; 66:21;69:5;77:18; 78:21;99:16,22; 103:15,22;110:2, 21,22;121:23; 122:9,11,14; 140:24;145:23; 149:23;153:16; 155:2;157:16; 163:15;175:12 intoxicant (1) 9:6 investigate (1) 130:25 investigation (6) 43:14;114:25; 129:25;133:19; 177:13,16 investigative (1) 117:3 involved (4) 19:9,11;54:24; 138:5 involving (1) 150:4 iron (1) 49:12 irrelevant (2) 90:25;137:15 isolation (1) 68:22 issue (14) 37:3;41:17; 54:20;85:5;100:19; 101:3;128:1,21; 130:18;164:19; 168:2,4;182:13; 189:22 issued (1) 21:2 issues (5) 57:25;104:25; 164:19;180:17; 181:21
I				
ibuprofen (1) 185:16 idea (5) 42:17;49:22; 109:3,4;134:20 identification (1) 41:19 identified (3) 33:12;43:9,14 identify (2) 35:16;56:25 ignorance (1) 126:18 ignorant (1) 108:16 illiterate (1) 149:5 illness (2) 117:5,7 imagine (1) 18:24 immediately (7) 27:11,12;56:7, 13;71:8;83:11; 183:15 immobilized (1) 62:2 impersonate (1) 42:2 impersonating (2) 38:25;40:14 imply (1)				
J				
				jacked (2) 64:12;181:18 Jackson (26) 21:16,19;22:5; 30:23;31:3;32:6, 17;39:1,1,4;41:10;

42:14;44:25;47:24; 50:20;54:16; 108:14,15;114:15; 116:5;120:13; 121:8;122:4,10; 123:22;125:23 jagged (13) 65:14;72:6,22, 23;74:5,9,11,21; 75:1,9,16;77:17; 173:13 jail (52) 9:20;20:15; 21:15;22:3;24:16; 25:2,8;58:19,25; 59:3;61:8,9;67:13; 69:22;85:19;86:18; 98:9,22,23;106:22; 108:20,23;110:2; 131:19,20,24; 133:7,13;134:20; 135:1,19;137:15, 16;138:3;139:4,5, 20,23;140:22; 141:7,8,9;142:10; 153:14;157:21,21; 158:17;171:20; 172:8;185:23,24; 186:1 jailhouse (20) 21:16;22:5; 25:11;26:7;37:22; 56:15;57:14,15; 61:13;70:11;85:2; 105:6;109:4,23,24; 136:20;140:25; 159:16;184:18,20 Jan (2) 2:6;5:1 January (6) 37:9;42:17;47:5; 113:22;115:3,4 jaw (5) 54:12,15,16; 116:6,7 JB (1) 16:18 Jeff (9) 58:5;71:20;88:7; 144:1,4;153:24; 161:22;168:4; 178:5 jerked (1) 181:18 job (13) 16:24;24:25; 57:18;107:6;129:8; 145:17;146:1; 165:16;170:16,18; 171:4;186:21,22 jobs (2) 171:7,9 Joiner (3)	6:11;95:22,22 joining (1) 6:10 joints (6) 17:25;18:1,3,4; 92:24;93:3 joke (4) 30:23;119:19; 120:9;122:15 jokes (2) 39:1;108:15 joking (2) 120:15;122:15 Jonathan (4) 6:11;71:24;72:1; 92:18 Jones (71) 6:16;38:13,20, 25;39:4;41:2,2,6; 42:14;43:8,8,8,8; 44:10,11,13,13,14, 19,23;46:4,23; 47:16,19,19,20,21, 22,23;48:1,2,3,4; 50:19;54:1,3,10; 59:8;61:14,17,22; 62:6;69:4;84:4,5; 100:9;114:1,4,7,9, 15;115:7;116:1,3, 9,11;120:12; 121:12;122:6; 143:10,23;148:8, 13,14,15,19;151:7; 160:13,13;162:15 Jonesboro (2) 10:3;145:18 Jones's (2) 41:4;54:11 judge (37) 23:8;25:8,9; 33:12;35:15;37:7, 9,10;60:5,6;83:14, 14;109:19,21; 113:21,24;114:3, 17;115:2,9,11,12, 17,17,20;116:16; 119:10,23;125:19; 129:20;134:7; 160:20;161:16,17; 163:7;173:9,20 jump (4) 16:20,25;71:17; 124:2 jumped (11) 31:2,3;78:10,11, 16,20;79:4,5; 104:11;139:16,17 jumpsuit (6) 98:10,22,23; 99:10,15;100:20 June (1) 10:1 junior (2)	15:13,14 junk (1) 62:12 jury (3) 13:10,11,13 K Katrina (1) 16:7 keep (12) 8:10;25:6;36:14; 56:4;76:22;113:12; 126:5,6;139:18; 148:19;150:16; 151:24 keeping (1) 123:16 Kennis (1) 32:5 kept (10) 24:18,22;32:1; 76:20;96:15; 107:19;128:25; 155:5,6,9 kick (2) 30:18;82:22 kicked (8) 22:5;23:6;38:14; 65:12;82:23;84:18, 22;119:16 kicking (1) 121:13 kicks (2) 74:13;121:20 kids (1) 179:20 kill (1) 150:3 killer (1) 136:18 kind (12) 9:21;17:18;47:9; 49:2;75:22;104:18; 112:3;118:7; 139:13;155:3; 158:3;170:14 King (3) 14:8,8,9 kiosk (1) 132:7 kit (3) 136:24;137:3,7 knee (1) 50:21 knees (15) 17:7,22;18:6; 31:17;56:2;171:13; 179:24;180:2; 181:11;183:7,8,10, 12,25;187:14 knew (5) 30:21;31:3;78:7;	139:7;158:13 knocked (41) 31:6;38:15;49:6; 50:5,9;51:6,7,9,10; 53:2;62:3;63:8,13, 18;64:20,21;65:9; 72:12;73:9,21; 74:2,7;75:14,14; 76:9,16;77:10,19; 80:8,17,24;81:5,21, 24;82:5;83:7,20; 173:5,6,19,21 knocks (1) 51:15 knowledge (8) 22:1;44:18;45:7; 138:2,4,7,9;140:1 known (1) 144:18 knows (6) 110:13;148:7,7, 8;149:18,18 L labels (1) 168:20 laceration (2) 155:17;156:15 lacking (1) 15:18 ladies (1) 94:24 lady (10) 14:17;19:13; 29:18;89:17,18,19, 23;110:17;111:5; 165:13 landed (1) 80:15 Langford (1) 10:25 Las (1) 12:23 LaShaundra (7) 40:25,25;43:15; 47:20;48:2;54:4,7 last (23) 9:2;14:9;15:2; 17:16;33:2;71:21; 104:6;105:10; 111:1,10,13; 115:16;133:10,14; 137:10;144:15; 158:20;165:4; 173:11,12;178:11, 17;186:20 late (2) 22:8;106:21 later (6) 57:24;60:12; 63:10;76:2;111:17; 143:17	laugh (1) 30:23 laughing (6) 119:19;120:9,15; 121:16;122:15; 123:1 law (3) 104:10,12;172:2 lawful (2) 5:24;189:11 laws (1) 2:13 lawsuit (4) 7:2;19:11;24:14; 130:9 lawsuits (1) 19:10 lawyer (8) 8:18;58:4;147:7; 160:10,19,21,22; 161:14 lay (1) 187:11 laying (1) 172:10 layman (1) 56:24 layperson (1) 56:25 leading (1) 2:17 leaning (1) 32:5 learned (3) 16:20;23:14,19 least (2) 139:5;147:11 leave (3) 99:4;157:21,23 left (9) 64:1;70:23; 71:16;92:25; 107:24;157:24; 161:7;179:2;186:9 left-hand (3) 30:25;104:9; 122:4 leg (1) 187:15 Legacy (1) 16:17 legal (1) 172:11 legs (9) 18:4;31:21;99:7, 7;122:2,10;180:11; 181:6,7 lesion (1) 93:1 less (2) 17:2;180:5 letting (1) 129:7
---	--	--	---	--

level (1) 93:18	177:3,6;181:14	30:7;31:1,25; 43:3;61:24,25; 72:10,10;80:21; 104:9,20;107:18; 138:17;148:18; 155:4;161:17; 163:12	64:3;95:7;114:22	14:20;15:20; 25:4,5;70:13;84:6; 117:21;119:17; 124:1;126:9; 131:23;158:20
licensed (3) 56:6,11;68:8	live (9) 10:24;12:19; 14:6,22;158:1,16; 159:4,9;179:19	looking (14) 35:22;36:8,14; 55:1;62:1,20; 66:16;101:4; 103:10,11;110:10, 11;122:3;160:16	M	Marines (1) 12:21
lick (3) 72:15,19;77:19	lived (1) 42:12	looks (3) 31:23;62:6; 69:19	ma'am (80) 7:4,6,8;10:7,16, 22;11:4,7,25; 12:10,13,22;13:15, 21,25;14:18;15:3; 16:14;18:10,12,15; 19:2;20:4;22:2,11; 26:9;34:2;46:3,9; 48:17;54:3,8;57:7; 58:21,23;59:14,17; 60:5,14,16,20;63:5, 9,15,20;65:2; 67:24;69:14;73:11; 76:13;77:8,12; 80:19,19;81:1; 86:1;89:8,11; 108:4,8,10;118:22; 121:5,5;127:3,24, 24;129:11;130:3; 132:6;133:8;137:6; 139:9;140:3;156:2, 20;171:5;182:1; 184:20;187:19	Markennis (13) 21:16,19;22:5; 30:23;32:16;44:25; 47:24;50:19;54:16; 108:14,15;116:5; 125:23
lie (22) 23:7,8;44:17,21; 45:6,10,19,22; 46:25;47:1,2,9,12; 76:18;83:25;84:1; 95:8,10;123:6; 143:15;161:16,18	lives (1) 14:15	loose (30) 56:18;67:2; 69:11,14,14;72:5, 6;74:17,18;75:20, 21,21,22,23,25; 76:1,2,8;77:17; 80:4,5,13,22;82:8, 9,10,16;124:16,21, 24	married (1) 12:12	matter (4) 5:18;6:15;9:7; 185:8
lied (7) 39:20;45:2,9,9,9, 18;46:11	living (1) 13:20	Loosen (1) 52:24	machine (3) 141:25;187:6,7	matters (3) 6:18,25;140:7
life (15) 49:14;86:15; 100:11;105:13; 108:13;117:13; 145:8,22;159:25, 25;164:20;179:18, 20;182:15;184:13	LOC (1) 155:22	loosened (2) 84:3;173:22	mad (1) 62:12	max (1) 185:18
lifestyle (1) 16:8	located (5) 6:7,8,9;7:7;106:9	lose (2) 25:5;187:6	maintained (1) 122:23	maximum (1) 175:9
lift (8) 17:6,21,25; 91:16;164:10,12; 166:17;171:12	location (1) 6:8	losing (1) 24:25	majority (1) 18:2	may (41) 2:5,8,18;5:7,25; 8:25;11:6;24:14, 16;25:24;26:1,2,4, 4;33:21;41:8; 55:13;58:25;59:6; 66:13;69:2;83:19; 86:25;88:15;94:25; 95:13,20;105:12; 106:20;109:12,13, 13,13,15;110:7; 123:16;154:18; 155:13;158:17; 163:19,21
lifting (1) 156:24	locations (1) 6:10	loss (2) 119:2;187:22	makes (4) 26:24;57:2; 96:12;156:22	maybe (27) 10:18;16:12; 17:4,15;18:18; 50:8;53:14;60:23; 61:1;74:14;110:7, 7,9,13;113:8,8,17; 127:5,11;139:6; 143:17;164:7; 166:19;178:14,14, 15,15
light (2) 54:17;113:1	lock (4) 54:12;57:8;86:8; 149:12	lost (3) 80:20;118:4; 181:4	making (3) 39:1;108:14; 150:13	mean (48) 13:13;14:3; 15:13,25;16:1,3; 20:10;26:19;28:23, 25;29:23;31:23; 48:20;51:13;52:11; 55:20;56:12;75:1, 2;81:9;88:4;96:19; 97:12;107:8; 108:21;112:15,17, 25;116:2;121:20; 133:9;139:3;153:4; 163:14;169:5;
limbo (3) 21:7,8,9	lockdown (2) 86:3;89:19	lot (12) 16:18;20:7,19; 56:9;128:1,2,3; 139:23;168:6; 179:6,9;180:6	man (34) 27:18;28:4,8,8; 29:2,20,22;30:2; 32:8;38:14,22; 39:12;52:22;59:12; 81:11;85:4;86:5; 95:18;102:5;105:5; 108:13;122:25; 123:7;124:7; 140:18;145:15; 148:11;150:2,2,5; 151:22;155:5,10; 183:11	
line (1) 62:17	locked (4) 54:18;70:18; 105:11;174:14	loud (1) 93:7	males (1) 78:5	
lines (1) 158:18	lodge (3) 97:18,18,20	love (1) 143:5	mama (7) 48:21,23,25; 117:14,14;157:18; 158:16	
link (1) 36:1	Loegel (11) 6:11;87:2;89:2; 92:14,18,18;93:5; 95:12,16,20,24	low (3) 33:4;53:21; 154:6	Mann (2) 2:6;5:1	
lip (13) 54:15;56:19; 63:25;67:2;69:12; 70:22;72:16;73:10; 77:23;78:8,19; 154:6;156:9	long (16) 10:14,17;15:4; 22:3;98:21;118:23; 129:23;136:17; 149:15;152:7,11; 159:6;165:15; 167:13;179:21; 186:20	lower (1) 30:9	many (12)	
listed (3) 111:3;154:16; 163:14	longer (12) 11:3;16:8;17:5,6, 21;57:18;125:7,9; 158:1,16;164:10; 177:17	lucency (1) 92:25		
Listen (4) 58:4;86:7; 137:12,13	longest (1) 16:11	luck (1) 181:17		
listening (3) 37:25,25;148:14	look (36) 28:9,9;40:24; 51:4;54:18,25; 57:23;58:17;72:15; 81:16,19;89:15; 91:15;101:24; 104:16,18,19,19, 20,21,23,23; 107:18,19,21,21; 110:6;113:3; 118:18;125:2; 126:7;155:10; 163:10;168:7; 182:7;184:22	lunch (1) 8:8		
lists (1) 161:1	looked (17)	lungs (1) 156:11		
literally (1) 75:7		lying (9) 37:21,21;40:22; 55:24,25;63:18;		
little (12) 7:20;27:6;51:21; 64:17;72:8;110:23; 127:6;158:1,16;				

172:11;174:6,7,12, 13;175:1;178:22; 179:6,8,9,11; 183:16;188:24 meaning (1) 64:13 means (12) 74:10,11;125:6; 139:10;147:24,25; 163:2;172:10,10; 176:21;178:25; 183:18 meant (4) 55:21;75:9; 125:20;158:3 meat (8) 81:10,11;125:13, 13,14,17,18,21 mechanics (2) 16:21;17:1 Medical (106) 10:13;27:23; 28:1,10,13;32:2,5, 18;57:9,9;58:16; 65:15,17,18,19,21, 22,23,25;66:3,6,6, 8,8,18,23;67:7,9, 14,24,25;68:1,3,4, 5,5,21,22,22;69:3; 70:11,15,17;71:15, 18;72:2,4;73:5; 75:7,8,16;77:5,6, 16,16;78:4,22; 82:19;83:15;84:23; 85:4,6,7,11,16,18, 19;86:25;87:5; 88:11;89:17,18,24; 90:17;91:13,24; 92:2,6,21;93:23; 94:14;95:6,9; 100:24,25;101:2,4, 5;102:7,7,10,12; 153:12,13;164:19, 19;165:25;167:25; 168:6,13;184:10, 11,24;186:21; 189:2,10 medicate (2) 159:8;187:2 medicated (1) 128:6 medication (6) 9:5;118:7,14,23; 129:10;185:23 medications (2) 129:12;185:4 medicine (4) 89:20;118:11; 119:3;159:8 meditate (1) 187:20 meds (1) 158:21	meeting (1) 36:1 members (2) 13:11;130:2 memo (1) 143:5 memory (2) 9:6;53:10 men (1) 99:24 menacing (1) 104:22 mental (9) 57:25;117:5,7; 118:3;128:15,16; 154:16,17;158:18 mention (3) 57:2;92:5;190:3 mentioned (5) 18:22;91:24; 155:24;156:16; 165:17 mentioning (1) 156:1 Mercy (4) 159:23,23,23; 168:21 message (9) 142:19,21; 143:20,21,22; 144:21;148:5; 150:22;151:8 messaged (1) 150:17 messages (1) 146:14 messed (3) 72:17;122:21; 173:12 Messenger (9) 150:10,11,16,17, 19,20,23,24;151:3 messing (1) 131:3 metal (1) 127:17 metastatic (1) 93:1 Metro (11) 6:8;13:3,6,7,12, 14,24;14:3,4; 16:15,16 middle (4) 31:13;61:16; 92:23;157:17 might (2) 8:8;162:14 Mild (1) 156:17 military (3) 60:18;69:2,5 Mims (11) 24:18;110:13,15;	111:7,8,11,11,16, 18;188:16,19 M-i-m-s (3) 111:2,12,14 mind (4) 33:3;95:16; 172:13,17 mine (1) 160:14 minor (1) 127:11 minute (7) 88:18;120:1; 131:16;142:9; 163:23;165:17; 180:1 minutes (3) 27:20;33:24; 176:23 mirror (1) 80:21 misdiagnose (1) 159:20 misdiagnosed (3) 56:21;57:4; 159:22 misheard (1) 160:14 misreading (1) 163:18 misrepresenting (1) 46:22 miss (2) 111:1;131:10 missing (12) 56:1;64:25; 72:17;74:22,24; 76:3,4;126:14; 168:1;171:3; 173:15,24 mistake (1) 169:7 mistaken (1) 164:18 Mobile (5) 2:7;5:7;6:7;10:5; 15:5 mom (4) 11:10,10,14; 15:16 moment (4) 18:25;88:3; 95:17;178:8 money (3) 17:12;151:9; 186:20 Monster (1) 144:11 Montana (2) 17:11;18:9 month (4) 109:6,9;150:21; 178:16	months (6) 117:11;118:24, 25,25;119:1; 167:14 mood (1) 49:13 more (21) 15:16;20:7;97:2, 3;100:23;105:17; 112:8;122:15; 130:5;132:3,4; 139:6;149:2; 153:20;157:11,12; 169:5,22,25;170:1; 184:23 morning (8) 73:5,13;74:19; 91:7;152:14,16,17, 25 most (2) 58:1;89:12 Mostly (1) 20:18 mother (27) 11:9,16,17,18,19, 20,23;12:3,7; 13:18;14:8;15:15; 22:20;93:12;117:8, 9,10,23;118:4; 157:15,16,21,25; 158:11,24;159:5, 20 motor (5) 133:19,22,23,24; 134:3 Motrin (1) 155:19 mouth (56) 61:23;62:18; 64:18,20,20,22,25; 65:7,16;72:9; 73:16,22,25;74:2,3, 4,8,8,9,11;75:10, 23;76:10,17,19,20, 21,23,23,25,25; 77:14;78:9;79:22, 23;80:2,25;81:2,7, 8;82:4,6;102:24; 103:9;124:15,20; 125:7,8,9,13; 126:10,18;127:2, 16;149:8;174:3 move (12) 6:19;24:14; 60:11;75:4,6,8; 83:3;92:9;127:16; 129:25;155:6; 186:24 movement (1) 127:16 movie (2) 32:3;72:11 movies (1)	145:21 moving (6) 8:10;75:2,3; 103:9;156:18; 179:2 MRI's (1) 96:24 much (3) 127:12;166:20; 180:5 multiple (7) 56:19;93:1,12; 154:7,23;158:25; 159:1 murder (1) 135:23 Musculoskeletal (1) 156:14 must (2) 160:13;166:9 myeloma (5) 93:1,11,13; 158:25;159:2 myopically (1) 139:18 myself (10) 6:5;7:21;84:10; 97:5;124:10,14; 149:12;165:16; 174:23;187:19
N				
Nadja (2) 14:16,19 naked (5) 31:22;97:22,23; 99:10;124:18 name (71) 6:14;9:10,16; 14:15;15:2;21:19; 32:7,24;33:1,3; 38:13,16;40:11,11, 16;41:4,8,10,14,17, 19,22,25;42:4,7,20, 21;43:7;44:14; 47:11,18;50:17; 52:7;53:7;54:21; 66:14;84:5;90:10; 105:9;106:8;108:6, 14;109:8;110:3,16; 111:1,2,7,10,13,17; 112:21;114:15,22, 24;128:9;136:10; 143:9;144:10,11, 12,15;148:12; 149:17;151:11; 158:23;163:13,13; 178:5,9;188:18 named (6) 20:1,1;29:8; 60:12;66:10;68:8 names (10)				

14:25;32:4; 39:11;41:11; 114:16,25;115:13, 19,20;136:5 Nancy (1) 6:11 napkin (1) 73:23 narcotics (1) 186:15 natural (1) 118:2 nature (1) 156:20 naval (1) 158:13 navigate (1) 9:1 near (1) 75:9 necessary (1) 2:16 need (34) 8:5,10;27:8,10, 19;36:21,24;45:15; 73:2;85:4;86:23; 88:15;97:2;105:20; 114:23,23,24; 115:2,13;120:17; 124:8;136:5,13; 161:14;165:21; 179:17;181:9,10; 183:16,20;188:9, 12;189:24;190:5 needed (4) 118:10;120:15; 165:18;167:1 needs (2) 27:15;165:23 negativity (1) 130:11 neighbor (1) 145:20 Neither (2) 97:18,19 network (1) 112:7 neurologist (1) 180:17 neuropathy (1) 180:11 new (3) 24:19;144:19; 189:6 news (3) 147:12,14,17 next (9) 52:20;106:12; 115:14;121:10; 131:15;136:18; 143:14,14;162:19 nice (1) 49:16	nickname (1) 9:18 nicknames (1) 9:22 nigga (2) 143:4;147:4 nine (17) 66:11;69:9,19, 20,21,22;70:9; 73:5,12;74:18; 82:8,14;85:9,15; 90:11,15;113:8 ninety (1) 55:7 nobody (19) 47:11;48:23,24; 51:19;76:9;85:6; 86:7;95:5;101:1; 115:19;120:5,6,15; 149:11,20;150:4; 151:23;176:5; 179:17 nodding (1) 7:15 noise (1) 38:3 nolo (13) 20:24,25;22:14, 16,23;23:9,10,11, 13;24:3,9;133:15, 16 None (19) 47:1;49:22; 50:24,25;80:15; 85:18;103:20; 107:20;129:15; 130:13;149:1,1,4, 21;159:24;181:4; 182:18;185:18; 187:1 nontender (1) 156:12 nor (3) 168:14,14; 186:20 normal (3) 118:19;126:7; 179:20 normally (1) 179:21 Northern (2) 5:22;14:4 nose (2) 62:3,20 Notary (1) 5:2 noted (9) 15:7;63:25; 69:11;162:13,17, 18,20,22,23 notes (1) 63:17 notice (3)	2:22;5:24;18:2 noticed (1) 43:3 notified (1) 21:3 November (1) 169:1 no-win (1) 31:4 nude (4) 98:6,7,20;99:11 numb (2) 180:20,21 number (31) 5:20;35:19,22; 37:15;39:9,9; 43:19;46:7;61:3; 78:1,3;119:8; 143:9;144:17; 149:22;150:9,14, 15,23;151:2; 153:11,15,20; 160:4,16,23; 161:15;168:22; 169:13;171:18,19 numerous (4) 17:19;153:6,7; 168:1 nurse (9) 56:6,11;68:8; 74:18;76:1;82:7,8; 85:9;86:4	30:1,16,17;32:13; 38:20;42:19,21; 61:12,23;64:12; 65:4,8,12;69:9; 73:22;76:10;79:12, 14,15,19;95:24; 96:3;99:4,19,20; 100:5;116:18; 122:7;123:5; 124:19;126:1; 127:8;129:12; 148:24,24;150:10; 156:22;157:7; 167:11;185:6,8,16; 188:24 off-duty (1) 107:6 offense (1) 88:23 offered (1) 2:20 offering (1) 151:9 office (36) 21:4;24:21;25:5; 39:6;43:3;46:5,11, 15;48:9;104:2,6,7; 105:2,24,25;106:2, 3,9;107:1,11,15,23; 108:2,9;110:15; 111:23;113:13; 128:1;129:19; 130:2;146:16; 148:25;177:13,17, 18,20 officer (20) 24:17,19;32:22; 38:13;42:1,2;43:2; 65:5;105:3,11,16, 20;108:23;109:1,2, 19,20;136:9; 139:16;188:11 officers (28) 26:10;33:6,8,9; 34:5,9,10,11,12; 42:6;46:24;48:16; 52:5;62:13;63:7; 64:21,23;65:21; 66:4,12;67:4,21; 78:9;107:12;112:6, 6;171:20;172:8 officer's (4) 43:3;78:6;104:2; 111:1 offices (2) 2:6;5:6 Off-the-record (1) 96:2 often (1) 150:21 old (9) 9:23;13:1;29:18; 53:16;61:1,15,17,	18;147:3 older (3) 53:13,14;60:25 Once (13) 44:7,10;46:3; 66:3,4;67:20; 84:17;94:14;100:5; 116:7;152:1; 153:20;186:9 one (144) 12:18,23,24,25; 14:23,24;16:10; 18:18,18,19;19:12; 20:7;21:9;25:3,7,7; 30:8,17;31:15,24; 32:7;35:14,15,20, 21;36:5;37:23; 39:2;40:15,15,16; 43:20;44:6;45:11; 47:14,21,22,23; 48:1,2;50:17;51:5, 5;52:6;53:1,2,11; 54:1;55:11;56:10; 58:2;59:8,9;60:8; 66:7,10,19,21; 67:24;68:4,20; 70:2,11;76:1; 77:19;82:1,2,3,8,9, 10,16,18;83:7,20, 23;84:3,9;86:15; 91:7,7;94:24; 95:17;97:18,19; 100:23;105:21; 111:2;113:18; 114:23;117:23,23; 118:1;121:7;124:7, 15,24;125:1; 132:14,19,25; 133:5,5,14;141:15, 20;142:24;151:11; 152:22,23;153:7; 155:1,16;156:5,14, 15;157:7,22; 158:18;160:11,12; 162:19,22,22; 163:14;164:12; 167:23;168:5,25; 169:25;170:1; 171:5,24;172:21; 173:11,13,21,22; 175:4,4,5;176:20, 22;179:15 ones (9) 38:12,13;57:24; 81:21;82:12,17; 163:1;173:13; 188:8 One's (3) 12:21,22,22 ongoing (1) 177:15 only (35) 7:14;11:8;23:13;
--	--	--	--	---

34:10;47:23;48:1, 2:54;20:66;18,21, 22:67;24:68;4,19, 19:70;11:82;7; 84:5;103:1;110:12, 14,17,18;111:25; 115:3;129:13; 147:7;149:7; 152:20;159:5; 175:23;177:3; 181:23;184:2; 186:23 open (11) 21:9,25;26:22; 36:3;84:14,21; 98:3;138:17; 151:21,22;179:2 opened (3) 16:23;36:1; 177:13 opening (3) 36:18,19,20 operate (1) 166:10 opiate (3) 157:5,6,7 opiates (2) 157:8,11 opinion (9) 46:20,21;160:5; 161:2,3,4;162:6,7,7 opposite (2) 180:5;181:16 OPS (11) 43:13;44:5; 46:13;55:1,4,8,16; 60:2;73:19;162:25; 163:6 opted (1) 85:3 option (1) 157:20 options (2) 162:16;163:14 oral (3) 5:9;154:5,8 orally (1) 150:14 ordeal (3) 45:24;103:13,13 order (5) 100:23;105:9; 154:11;165:13; 166:8 ordered (3) 39:10;115:21; 116:16 orgasm (2) 181:8,10 Orleans (1) 144:19 out (184) 16:5,6;21:2;22:5,	20,22;23:1,9;25:3, 20:27;16,22;28:5, 19:30;8;31:7,10, 10:38;15;40:12; 43:2;49:6;50:5,9; 51:6,7,9,10,15; 53:2;56:23,25; 57:14;60:8;62:3, 17:63;8,13,18; 64:20,22;65:9; 72:13;73:9,21; 74:3,4,7,8;75:10, 11,12,14,14,15,18, 23:76;9,17,20; 77:11,13,19;80:9, 17,22,25;81:2,5,21, 24:82;2,5,23;83:3, 7,12,21;84:10; 86:8,13;87:2; 89:11,12,16,21,21, 23:90;3,12,13,16, 17:91;2,14,17; 92:7;93:7;96:11; 98:18;99:22;100:6, 6,10,24;101:1,3,5, 7;102:6,23;104:7; 105:24;106:1; 107:17;114:9; 115:22,25;116:13, 17;117:1;118:16, 16;119:4;121:8,9; 124:4,6,7,9,15,20, 25:125:1,6,14,15, 17,17,20,22,24; 127:13,14;128:22; 132:17;133:1; 136:17;137:4; 140:8,16;141:7; 142:13;148:23; 152:17,18,22; 154:20,22,22; 155:1,5,6;159:5; 163:2;168:21; 173:6,7,12,18,20, 21;175:2,3,4,5,6, 21,23;181:5,15; 187:4;188:3,12 outside (13) 13:6,7,12,13,23, 24;106:3;145:21; 149:12;169:19; 185:15;189:4,15 over (19) 8:2;17:19;33:19, 22,25;56:3;58:16; 80:6;81:9;85:1; 99:7;100:17; 116:16;119:1; 129:5;152:8; 166:22;167:25; 173:23 overall (1) 171:11	over-medicate (1) 185:9 overseer (1) 48:7 own (2) 16:23;43:22 P paces (1) 28:25 pack (1) 142:1 packs (1) 129:2 padded (2) 27:6,17 page (11) 78:1;87:20; 92:19,19,20,23; 95:23;168:22; 169:10;171:14,18 pages (4) 168:1,2,19;169:9 paid (1) 170:11 pain (42) 17:18,24,25; 18:1,3,7;26:24; 27:1,2,8,8,15,19, 20;28:14;42:13; 49:8;85:16;86:17; 101:11;102:25; 129:16;155:17,23; 157:10,12;170:12, 14;182:16;184:8,9; 185:9,12,15,19,21, 23;187:8,8,10,11; 188:3 painful (1) 89:12 paining (1) 27:21 pair (1) 99:21 PALMER (62) 5:16;6:14,20; 34:16,19,22;35:2,4, 9,14,20;36:4,7,12, 18;37:1;57:23; 58:4,7,12,14;71:19, 23;72:1;87:6;88:1, 6,13,17,22,25; 92:13;93:5,25; 95:12;96:1;153:21, 23;161:21,25; 162:4,12,18,21; 163:3,12,19,23; 164:1;168:18; 169:3,8,14,24; 188:22,25;189:8, 12,14,21;190:2,7 pants (1)	99:21 paper (12) 61:10;73:15; 78:9;135:25;136:7, 11;138:6,11; 140:12,15;149:9; 161:17 paperback (1) 133:3 paperbacks (1) 133:4 papers (2) 94:18,18 paperwork (4) 43:13,13,21; 160:8 paragraph (2) 173:4;177:11 paragraphs (1) 162:10 pardon (2) 126:18;154:24 parents (4) 119:2;158:10; 160:2;181:24 Park (4) 14:24;106:13,13; 108:2 parking (2) 24:21,25 parlance (1) 7:18 part (18) 18:19,19,20; 27:4;30:9,9;32:2; 35:10;39:8,8; 64:11;74:21;93:4; 114:25;117:24; 120:14,15;171:5 participants (1) 172:2 participated (4) 171:21,23;172:4, 8 participating (1) 171:25 particular (1) 37:15 parties (3) 2:4,18;6:5 partition (1) 121:6 parts (1) 181:5 pass (1) 163:5 passed (15) 11:18;44:25; 46:25;83:25;160:7, 8,14;161:12,16,18; 162:1;163:4,7,7,8 passively (1) 172:16	password (4) 71:20,23,24; 131:13 past (8) 52:20;104:8; 123:13;144:18,20; 149:14;153:24; 167:5 pat (4) 25:21,22,22; 26:10 path (1) 118:12 patient (4) 154:8;155:15,17; 158:19 patiently (1) 28:11 pause (1) 57:20 pay (3) 24:21;186:19,20 paycheck (1) 17:14 paying (1) 24:25 PDF (3) 36:18,19,20 Peachtree (1) 106:12 peers (1) 43:9 pen (14) 53:8;136:2,3,7, 11,16,19,21;137:3, 4;138:18;140:11, 11,15 pending (1) 5:21 pens (3) 53:10;136:14,19 people (39) 35:16;39:23,25; 40:4,4,10,10,13,15, 16;42:11,14;49:24; 66:16;67:10;69:25; 114:19,20;115:4; 116:24;128:3,7; 136:5;139:22; 150:3,4;151:8,9; 153:1;154:23; 159:23,25;165:19; 170:23;172:18; 174:15;175:2; 184:25,25 people's (1) 139:21 Percocet (15) 56:4;71:14;97:3, 3,4;129:13,15; 185:19,20,20; 186:11,11,13,24,25 Percocets (1)
---	---	--	---	---

57:16 perfected (1) 37:8 perform (1) 165:20 Perhaps (2) 146:19,22 period (11) 28:15,15;68:18; 70:5,7;91:5,6,9; 146:5;147:6; 174:14 Perkins (1) 151:12 person (23) 11:1,8;40:15,16, 17:66;13;70:14,14; 101:8;110:12,18; 130:25;144:10,20; 152:8;155:1,2,4; 163:6,8;172:21; 175:5;177:25 personal (3) 103:6;116:18; 145:8 personally (2) 148:8;178:3 personnel (1) 142:11 person's (2) 32:24;144:10 phone (11) 55:5;77:22; 131:6;144:16; 148:10,13;149:22; 151:2;152:8,9,13 physical (1) 55:25 physically (5) 31:1;37:24;38:8; 40:6,8 physicians (1) 67:22 physician's (5) 63:12,17,22; 64:3,24 pick (2) 65:7;71:16 picked (7) 62:11;65:4; 73:22;76:10;79:11, 18,20 picture (1) 32:18 pictures (4) 32:12;81:18; 116:6;167:15 piece (3) 130:17;138:6; 140:12 pieces (3) 64:13,17;81:10 pierce (1)	97:16 pill (2) 128:4,9 pills (1) 180:12 pink (2) 133:19;134:3 pinky (1) 155:16 pins (1) 181:7 pipe (2) 51:16,19 peeing (2) 124:9,14 place (15) 56:8;59:6;60:12; 65:16;80:22;83:3; 96:11;98:15;108:2; 123:17;126:5,6; 172:15;181:13,15 placed (2) 69:5;174:6 placement (1) 154:9 plain (2) 100:14;101:2 plaintiff (8) 5:18;6:6;19:10; 168:15;171:19,21; 172:7;177:15 plaintiff's (9) 37:16;39:9; 43:18;119:8; 153:11;160:3,16; 168:22;173:5 plan (1) 160:1 planet (1) 163:9 played (1) 114:9 plea (2) 23:14,19 please (14) 7:10,11,16,19, 24:8;5,13,15;9:9; 49:12;78:1;81:22; 87:3;138:3 pleasurable (1) 129:3 pled (7) 22:14,16,16,20, 22:24;3,12 pm (6) 60:19;63:11,19, 23:85;10;155:13 point (28) 30:13;44:4;60:8; 70:22;75:10;78:23; 85:10,13;86:23; 87:2,7;89:9,10,12, 16,21,21;90:25;	99:14,15;100:6; 125:3;138:12,14; 158:11;159:12; 175:6;189:25 pointed (14) 89:23;90:3,12, 13,16,17;91:2,14, 17;92:7;154:20,22, 22;155:1 pointing (5) 89:11,14;91:14; 155:5,6 police (5) 23:1,5;42:6,8; 151:21 policies (1) 55:14 policy (1) 67:13 polygraph (3) 162:4,8;163:11 polygraphed (1) 160:5 polygrapher's (1) 161:2 pool (2) 13:10,12 pop (7) 81:10;115:16; 125:16;181:12,13, 13,13 popped (1) 116:6 popping (2) 61:23;151:24 pops (2) 96:11;181:14 portion (3) 37:6,12;162:3 portions (1) 153:15 pose (1) 187:21 positive (2) 112:8;156:12 possession (1) 98:21 possible (2) 92:25;93:15 Possibly (4) 12:4,10;90:21; 181:3 post (3) 16:4;17:10; 116:24 posts (1) 127:6 pounds (1) 164:8 practical (3) 56:6,11;68:8 practiced (1) 9:2	pray (2) 129:16;187:20 precipitated (1) 59:18 precisely (1) 170:10 preliminary (5) 6:17,24;33:11; 34:4,8 preparation (2) 8:19,23 prescribe (3) 71:13;118:13; 186:11 prescribed (3) 9:5;155:18; 186:10 prescription (3) 97:4;157:5,6 present (14) 37:9;38:10;40:7, 8;59:12;105:3; 111:22;115:4,8,13; 120:25;121:1,2; 152:25 presented (1) 182:4 presume (2) 56:7;169:14 pretending (1) 124:11 pretty (3) 112:8;142:8; 150:24 prevent (1) 167:11 prevents (1) 156:21 previous (2) 63:7;113:25 previously (3) 6:6;96:6;116:12 printed (2) 132:12;169:15 prior (11) 2:20;104:25; 113:22;114:7; 115:5;131:18,20; 134:19;182:2,8,9 prison (37) 20:14,24,25; 21:1,2;23:17,21; 61:7,8,10,12;82:2, 3;128:12,14,14,15, 16,18,19;129:2; 133:14;134:7,8,9; 137:9,15;138:10; 139:3;141:5,6,11, 11,12;151:13; 173:25;174:2 prisoners (1) 129:7 private (1)	187:25 privileged (2) 69:24;90:19 probably (8) 88:22;101:24,25; 102:18,20;112:5; 184:8;188:12 probation (42) 22:15,19;23:12, 17;24:17,19,22; 43:2,2;104:1,2,6; 105:2,11,16,20,24; 106:2,3,9,25;107:9, 11,15,23;108:2,9, 22,25;109:2,19,20; 110:6,8,17;111:1, 22;112:5,6;113:13; 188:9,11 problem (2) 34:21;146:18 problems (2) 37:4;145:25 Procedure (2) 5:4,25 proceedings (2) 5:10;111:3 process (11) 9:4;117:25; 126:20;133:7; 134:15;138:3,4; 139:1,8;140:1; 183:4 processed (1) 27:13 produce (1) 169:18 produced (3) 37:13;153:13; 189:16 production (2) 189:6,7 professional (2) 57:1;112:5 prompted (1) 128:15 Pronounce (5) 32:8;108:14,16, 17;155:19 proper (2) 163:16;189:19 properly (3) 17:22,23;171:12 propounded (2) 15:8;37:14 prosecute (2) 23:10,13 protect (4) 48:9,13;59:15,17 prove (3) 55:21,22;111:20 provide (1) 180:15 provided (7)
--	--	--	--	---

5:3;92:20; 153:12;154:8,15; 166:1;178:18 provider (1) 153:13 providers (1) 56:9 provision (1) 154:16 pry (1) 151:20 prying (1) 151:22 psychiatrist (1) 128:14 psychiatrist's (1) 127:25 PTSD (3) 127:23,25;128:3 Public (1) 5:2 pull (16) 28:14,15,16; 34:16,19;35:13; 57:22;77:24;87:2; 95:12;125:18; 131:9,12,15; 156:22;180:5 pulled (23) 50:2;51:25;52:1, 1,2,2,19;53:1,15; 75:11;101:9,10,20, 21;102:25;103:12, 12;125:14;179:15; 181:18;183:9,12, 24 pulling (7) 35:14;68:24; 103:2,2;156:24; 182:21;183:11 pulls (2) 156:25;157:1 Pumpkin (1) 72:10 punch (5) 50:5,16;51:20; 122:9;172:3 punched (3) 65:12;84:22; 119:16 punches (6) 29:23,24;51:8; 121:20;124:3; 173:1 punching (4) 83:11;100:4; 121:13;123:17 purple (5) 71:5;89:15;92:9; 155:4;185:1 purpose (1) 26:11 purposes (1)	5:24 pursuant (2) 5:23;67:16 push (4) 74:14,14;156:22, 24 pushed (5) 62:8;72:22,24; 85:4;127:17 pushes (1) 164:10 put (74) 25:11;26:6; 27:17;28:3;41:2,3, 12;43:17;47:5,7, 14,15;49:18;50:6; 53:25;57:15;61:4, 11,12;63:17;64:8, 8,18,19;73:22; 75:7;76:19,24,25; 83:2;99:5,24; 100:2,3,20;115:1; 117:14;118:11; 122:23;123:21; 126:5,17,21;127:1; 128:4,9;129:14; 133:10,11;135:3, 11,13,16;137:5,18; 138:17;140:4,18; 141:4;143:12; 149:9;150:14; 157:1;158:10; 177:24;179:16; 183:8;187:17,22, 23,24,25;188:2; 189:22 puts (2) 43:22;50:11 putting (8) 43:22;50:21; 56:4;62:19;64:16, 16;100:3;138:6 Q qualifications (1) 93:22 qualified (1) 46:23 quick (3) 57:22;58:6; 95:21 quit (1) 17:3 quoting (1) 93:4 R Rafferty (17) 29:9,11,21,23; 37:11;43:16,17; 46:25;50:18,19;	116:4;117:1; 133:17,19;134:1; 143:19,23 rage (1) 103:21 ran (3) 19:13;118:16,16 random (1) 108:7 randomly (1) 106:25 rapport (1) 177:20 rate (1) 156:12 rather (4) 25:2,6;36:20; 160:7 ratting (1) 147:24 Ray (8) 143:9,9,21; 145:13,13,14; 147:17;151:4 reaching (1) 188:12 reaction (1) 181:1 reacts (1) 152:8 read (30) 36:25;37:6;55:6; 73:20;77:21;78:2; 89:2;92:15;95:14; 96:4;119:13; 122:20;124:23; 131:9;144:21; 146:23;149:5,6,9,9, 10;153:14,16; 154:1,19,25;162:2, 10,16;185:6 reading (5) 2:10;38:7; 113:22;160:22; 162:15 real (15) 26:25;35:15; 39:24;43:4;57:22; 81:12,15,16,19; 126:2,21,25; 127:14;144:12; 174:1 realistically (1) 40:14 realize (5) 21:18;27:10; 28:25;43:6;151:19 realized (2) 22:4;50:9 really (10) 18:21;22:20; 30:22;72:14;73:1; 93:10;109:21;	113:12;128:2; 143:16 rear (1) 152:18 reason (12) 26:18;44:16,16; 45:17;47:1;54:20; 65:15,17;85:17; 114:21;145:12; 171:1 reasons (2) 170:22,23 recall (24) 19:12;34:4; 47:21;49:6;53:23; 56:8;59:19;60:13; 66:15,17,19;69:18; 70:19,21;83:18; 90:10;93:6,10; 113:21,25;127:22; 129:21;132:20; 178:13 recalls (1) 41:1 received (4) 94:14;132:5; 168:11;180:8 receiving (1) 153:17 recess (3) 58:13;88:24; 163:25 reciprocate (1) 139:14 reciprocated (1) 146:17 recognized (1) 22:4 recommended (1) 166:1 reconcile (2) 12:4,9 reconvene (1) 189:25 record (12) 6:13;7:22;9:10; 37:8;39:14;40:21; 70:6;92:21;95:24; 96:3;153:16;156:3 recordings (1) 162:5 records (64) 44:5;46:1,7; 57:13;58:16;65:3; 67:16,22;68:7,24; 71:18;75:17;84:23; 85:8,19;86:19,23, 25;87:1,5,7;88:4,7, 11,19;91:24;92:3, 6,14,15;94:14; 95:1,6,9;96:5; 109:7;117:16; 119:6;153:13;	155:13,15;159:11, 17,18;162:6; 165:25;166:21; 167:20;168:1,6,9, 20,23;169:14; 180:14;181:20,22; 182:8,10,22;185:3; 188:13;189:2,10 recovery (5) 16:9,10,23; 17:13;152:6 re-enact (1) 145:16 refer (7) 37:14;43:18; 78:1;87:23;88:1; 119:5;153:10 reference (4) 48:21;95:21; 114:4;157:14 referenced (2) 32:22;160:4 referral (3) 154:10,11,12 referring (4) 38:9;63:2;116:9; 164:14 reflect (7) 65:3;117:16; 166:22;167:20; 181:20;182:8; 185:3 reflected (2) 87:1;91:23 reflecting (1) 68:7 refusal (2) 130:1;140:14 refused (6) 132:24,25;136:3, 4;140:13;146:16 refusing (1) 100:20 regard (1) 189:1 Regular (4) 99:18,21;156:11; 159:2 relate (1) 58:18 related (2) 20:17;168:14 relating (1) 2:13 relation (2) 56:7;59:9 relationship (4) 111:16,24;112:3; 188:11 relatives (1) 13:20 relax (1) 128:9
--	---	--	---	--

released (4) 23:25;58:19,25; 59:2	request (12) 105:12;136:23; 137:2;150:13; 168:7,17;169:20; 189:2,5,6,11,20	20:13;24:19	145:24;165:7,7,8	54:13;81:8; 123:8
relevant (6) 6:3;169:5,19; 188:7;189:4,17	requested (2) 21:6;189:5	revoked (1) 138:21	Robert (2) 178:7,9	runs (1) 124:11
religiously (1) 129:17	requesting (1) 188:7	Reynolds (1) 162:8	ROBINSON (55) 2:5;5:8,12,18,19; 6:12,24;9:11;15:1, 2;33:18;34:23; 37:5,10,21,24; 38:12,16,19,22,24; 39:18;58:22;62:16; 69:3;71:25;72:1; 75:24;78:7,8,24; 79:17;80:7;87:25; 88:25;92:17;95:14; 96:4,6;102:16; 117:4;118:20; 119:5;138:24; 147:8;153:10; 154:2;160:3;161:1; 162:8;164:2; 169:25;170:3; 178:12;190:8	S
relocate (1) 10:8	required (1) 166:3	rhythm (1) 156:12	Robinson's (1) 58:15	sad (4) 117:24,25;118:5, 5
rely (2) 88:20;168:15	reserve (1) 6:21	Rice (4) 26:8;77:1; 124:18;138:15	rock (1) 30:20	SAITH (1) 190:10
remaining (1) 6:15	reside (3) 11:3;14:1;117:2	right (124) 7:5,9,9;10:15; 11:4;12:5,9,11; 13:8,14,17;14:1,5; 15:4,7;20:5;21:8; 24:21;25:25;26:1, 5:27:16,19,24; 28:5,8,9,9;29:12; 31:10,23;34:1,1,1, 3,6,24;35:5,22,25; 36:13;37:5,18,20; 38:6;39:4;41:16, 24:45:1,25;51:15, 25;52:1;53:4; 54:23;58:6,9,24; 59:5;61:22;62:11; 63:6;64:11;65:25; 71:12,20;73:17,18; 74:12,15;75:5; 77:22,24;78:23,25; 88:7,23;89:15; 91:16,16,20;92:11; 93:14;96:10; 105:22;106:14; 109:25;115:23; 116:8,13;122:3; 126:24;128:5,12; 131:14;133:15; 134:6;141:11; 142:22,23,25; 143:2;147:1,7; 148:2,16;150:7; 151:23;153:5; 155:6;163:4; 169:12,16,17; 178:9;179:13; 182:20;183:22,22; 184:1;186:9;188:5; 190:4,7	same (25) 2:11;7:23;21:24; 30:17;37:3;53:11; 63:1,2;68:13,18; 70:5,7;71:21; 72:25;78:6;83:13; 91:5,6,9;96:9; 109:20;112:7; 118:6;121:9;130:6	
Remember (54) 7:13;19:12; 20:20;21:22;25:17, 25;30:19;31:6,7,7; 33:3,11;41:9,10,11, 12,12;50:3,12,12, 13,20;51:10,13,14, 23;52:4,5,8,9,17, 20;53:7,17;54:7, 10,11,15;58:24; 89:13;96:19;97:3; 98:18;103:2,17; 113:24;119:17; 132:19;135:21; 136:11,12;143:4; 147:7;167:22	resided (5) 10:14,17,20; 11:5,20	Robinson (1) 58:15	Ronald (11) 56:6,11,21;57:4; 66:11;67:1;68:8, 14;69:7;90:8; 154:18	Sanders (12) 56:7,11,21;57:4; 59:10;66:11;67:1; 68:9,14;69:8;90:8; 154:18
remembering (1) 33:3	resides (2) 11:23;12:3	responded (1) 31:1	room (25) 27:6,17,22; 28:18;50:14;54:14; 70:18;119:15,16; 121:10,14,15,25; 151:13,15;172:23; 173:1,2;174:22,23; 175:7,19;176:24; 177:3;186:4	sane (1) 128:25
remind (1) 33:5	responsive (2) 168:7;169:20	response (1) 37:13	rooming (1) 151:12	sat (6) 28:10;39:20; 61:22;90:6;123:1, 22
removed (3) 82:3;173:24; 174:2	rest (2) 82:2;127:9	responses (1) 15:8	roommate (11) 141:15,16;142:4, 5;174:8,9,11,12; 176:5,7,11	Saunders (36) 6:16;30:24,25; 31:2;32:6,17;39:3; 41:5,9;42:15; 47:25;48:3,5; 50:20;54:15;59:9, 10;62:6,7,12,20,20; 63:2,4;69:23;72:4; 114:15;116:5; 120:13;121:7,8; 122:3,9,23;123:2, 21
rendered (3) 160:6;161:4; 162:8	restroom (1) 163:21	result (6) 17:19;20:16; 168:12;170:4,15; 180:23	roommates (1) 176:17	saw (34) 31:10;52:16; 56:13;57:3;63:12, 19;64:25;66:11,13; 68:8,14;73:6,13; 75:18;76:2;82:8; 83:14;85:9,20; 106:1,24;108:7; 112:24;116:6,7; 122:13,13;125:20; 143:17;182:14,16; 184:14,16;186:10
repeat (1) 7:10	Resulted (1) 155:16	Resulted (1) 155:16	root (5) 64:17;72:8;76:7; 80:23;127:20	saying (71) 20:7;32:10; 33:10,13,15;37:24; 38:7,9,14;40:21; 43:12,21,25;45:6, 12,16;46:13;47:10; 51:14;53:17;56:21;
rephrase (1) 7:12	retaliation (1) 130:7	retracting (2) 124:4,5	roots (1) 127:21	
replaced (1) 17:16	retracting (2) 124:4,5	return (2) 11:13;12:1	routine (1) 154:12	
report (11) 7:15;43:19; 46:13;55:1,4,16; 60:2;89:3;94:3; 113:15;129:19	returning (1) 11:14	revenge (1) 145:17	Rowan (1) 6:11	
Reporter (15) 5:1,6;7,16;7:14, 22;8:1;120:2,10, 20,24;122:17,21; 131:10,12;146:21	review (6) 8:22;88:16; 169:6,9,21;170:1	review (6) 8:22;88:16; 169:6,9,21;170:1	rules (3) 2:13;5:4,25	
reporting (2) 105:13;107:9	reviewed (1) 154:14	ringworm (1) 169:2	run (3) 103:19,19; 179:20	
represent (3) 59:11;63:4; 178:2	revoke (1) 108:22	ringworms (1) 169:10	running (3)	
representing (1) 6:14	revocation (10) 20:16;25:2; 104:5,13;105:12; 106:18,22;108:21; 109:10,18	ripped (3) 99:19,20;125:15		
	revocations (2)	risking (1) 22:21		
		Road (2) 10:3;145:18		
		roadside (7) 16:23,24;24:20;		

57:3;59:13;63:22; 64:2,4,6;67:5; 68:11,18;74:19; 76:11,18;77:13,15; 78:19,20;79:4; 80:16,24;92:5; 93:9;94:11;95:7; 102:25;103:1,4; 114:19;120:2; 130:15;132:9,10; 137:5;138:24; 139:19,24;152:1; 153:1;156:19; 168:23;171:3,21; 172:14;174:17; 176:7;180:23; 182:20,22,23; 184:8;189:3	142:24;143:1 screenshots (1) 142:24 screws (1) 17:6 scroll (1) 35:23 scrolling (1) 153:24 search (1) 34:22 seat (1) 27:24 second (30) 6:3;32:6;34:13; 19:35;21;36:13; 39:9;40:6;43:1; 57:21;58:2;63:16; 66:13;68:24;69:17; 18:79:4;87:25; 89:3;95:25;119:10; 120:1;142:25; 168:6,20,25; 169:25;170:7,25; 178:8	sentence (1) 173:18 separate (5) 62:6;85:20; 130:15;171:20; 172:7 separated (10) 11:4;53:19;62:5; 85:13;87:17,21; 88:2,8,12;121:5 separation (8) 71:8;87:10,11, 13;94:5,6,15,21 September (1) 24:1 sergeant (11) 53:6,6,15;86:2; 101:9,11,13,18,23; 102:8,13 sergeant's (1) 21:4 series (1) 45:11 serious (2) 182:18,19 set (5) 43:11;62:13; 106:19;169:18,18 seven (6) 16:12;85:15; 91:7;109:15;110:1; 175:9 Several (3) 131:25;132:1; 185:3 severe (1) 185:9 severely (1) 159:1 Sex (1) 181:8 sexual (1) 31:24 shackled (16) 29:15;30:11,14; 31:13,21;48:3,11; 51:4;97:25,25; 99:4;100:9;120:16; 123:12;124:10,12 shackles (26) 28:22;32:12,13, 14;47:14,15;48:14; 49:7,17,19,25;50:4, 6,11,12,21;52:10; 53:24,25;54:9; 99:6;103:16,18,22; 119:15;183:24 shaking (3) 7:15;62:12,20 shall (1) 2:16 shape (1) 164:22	shard (1) 65:13 share (7) 9:1;36:13,14,19; 119:7;136:19; 171:15 sharing (6) 9:2;35:1;36:5,5, 8;37:3 sharp (1) 187:10 shave (4) 126:4,7,20,25 shaved (1) 126:8 shaven (1) 113:6 sheet (1) 149:9 shell (1) 30:21 sheriff (1) 42:7 sheriff's (17) 39:11;42:1;46:5, 11,15,24;91:11,12; 106:6,7,25;112:6, 12,19;130:8; 133:17;177:13 shield (1) 84:10 shift (5) 27:24;28:12; 101:24,25;139:21 ship (1) 158:13 shipped (1) 186:3 shirt (6) 51:25;52:7,7; 99:18,19,21 Shock (4) 30:9;180:24,25; 181:1 shocked (1) 97:14 shocking (2) 30:8,10 shocks (1) 181:2 shoe (1) 167:23 shoot (1) 62:4 shooting (1) 145:23 short (1) 113:5 shortly (1) 58:17 shot (4) 97:16,20;148:21; 152:4	shots (3) 145:18;180:10, 22 shoulder (43) 25:15;26:11; 28:5,6,7,51;21; 52:2;53:19;56:1; 65:17,18;71:6,16; 77:16;85:13;86:6, 17;87:9,11,13,20; 88:12;89:6;96:17; 102:5;155:7,10,10, 11;164:13,14; 165:12,23,23; 166:13,19,19; 170:6;183:5;186:8, 9;187:7,14 shoulders (2) 18:6;179:25 show (11) 34:15;42:13; 44:5;46:1,7;75:17; 81:22;89:13;145:3; 160:17;186:5 showed (8) 28:2,3;59:22; 89:19;91:13;102:4; 155:2;186:9 shower (38) 29:3,6,12;30:5; 31:9;48:4;49:6; 52:25;53:5;67:25; 68:5,21;70:15; 80:20;98:17,25,25; 99:16,22,23; 101:12;119:25; 120:6,12,14,21; 121:24,24;122:2,2, 11,14,16;175:3,7, 23,24;176:23 showers (3) 49:8;136:12,13 showing (2) 155:9;177:12 shows (3) 80:18;186:7,8 shut (2) 62:16,18 siblings (3) 13:22;14:20,21 sic (4) 5:20;54:17; 63:12;159:7 side (8) 30:24,25;51:1, 20;92:16;104:9; 122:4,5 sidetracked (1) 69:17 sideways (1) 54:12 Sierra (2) 10:25;20:18
---	---	---	---	--

sign (1) 131:12	62:23	48:21;112:3; 151:25	8:2;56:10;60:25; 83:13;112:3; 129:21;130:4,13; 143:18;144:3; 146:4,6,10,12,14; 152:23	15:15,16;16:6; 26:22;29:13,16; 49:9;57:16;71:3, 10;122:1,7,7; 129:7;152:1;164:2; 165:6;166:22; 167:6;173:2;183:3
signature (1) 2:10	slap (4) 29:16,19;48:18; 122:7	someone (14) 48:10;51:15; 54:24;111:9; 130:12;147:2; 151:20;158:4; 170:17;172:10; 180:4;184:14,16; 187:9	specific (2) 25:3;35:23	starters (1) 17:1
signed (2) 23:11;154:13	slapped (1) 84:21	someone's (1) 49:11	specifically (5) 14:6;59:10; 63:24;88:11;189:5	starting (1) 153:15
significant (1) 86:24	slapping (3) 48:18;100:4; 173:2	sometime (2) 106:20,21	spell (4) 110:25,25; 111:10,13	starts (3) 27:12;111:8; 168:21
silently (1) 171:25	slaps (1) 29:24	Sometimes (1) 96:11	spending (1) 15:16	State (4) 5:2;9:9;93:21; 172:6
simple (4) 20:19;21:11,23; 22:12	slave (3) 49:17;103:23,24	somewhere (6) 8:7;92:10; 113:19;142:12,14; 166:23	spin (1) 123:13	stated (8) 38:11;73:16; 89:5;93:6;96:6; 158:19;161:24; 186:19
Simply (1) 176:11	slaves (1) 103:23	song (6) 143:4;147:4,20, 21,23,25	spinning (1) 152:20	statement (10) 40:25;47:20; 54:5;73:19,20; 79:11,13,18;80:16; 128:21
Sims (1) 110:13	sleep (3) 56:3;181:6; 188:3	songs (1) 147:24	spitting (1) 124:16	statements (1) 43:9
sing (2) 143:4;147:4	slid (3) 135:17;138:17, 18	soon (12) 25:16,19;52:2; 57:12,14;86:8,10, 10;100:3;101:10, 20;135:12	spoke (18) 6:25;61:19; 91:18,20;128:20; 136:5;145:5,7,10; 146:9,11,17;147:5; 149:13;178:3,11, 17;179:1	States (1) 5:21
singing (4) 147:20,21,24,25	slip (6) 95:11,13,15,18; 96:7,22	sooner (1) 71:2	spoken (3) 8:19;143:8; 149:14	station (1) 133:21
single (1) 121:7	slipped (1) 95:1	sophomore (1) 15:13	spot (1) 133:21	stay (4) 130:10;149:16, 19;165:15
sit (8) 27:7,24;28:8; 59:25;75:22;85:17; 102:3;104:8	slot (1) 176:23	sorry (13) 13:19;34:2; 52:11,12;63:2; 119:6;144:2,5; 153:19;160:17; 168:19;183:23; 188:23	stabbing (2) 187:9,10	stayed (1) 70:18
sits (2) 54:12;105:25	slow (1) 7:20	sort (1) 128:8	staff (2) 86:1;110:22	staying (1) 14:8
sitting (5) 49:23;61:15; 82:21;85:16;89:13	small (5) 16:21;17:1;37:9; 64:1;70:23	sought (5) 128:16;168:9,10, 10,11	Stage (1) 10:10	stays (3) 11:9;14:23,24
situation (4) 19:17;31:4; 139:15;148:6	smaller (1) 37:2	sound (2) 25:24;26:24	stamp (5) 37:16;39:9; 43:19;119:8; 168:22	steadily (1) 61:23
situations (1) 61:4	smudged (1) 28:19	sounds (3) 93:14;156:13; 189:3	stand (6) 28:24;52:6; 107:22,23,24; 124:17	S-t-e-p-h-e-n (1) 9:13
six (6) 118:24,24,24,25; 119:1;185:17	snap (1) 117:20	source (1) 79:2	Standard (3) 6:1,2;60:19	Steven (5) 9:11,12;151:11, 12,16
sixteen (2) 15:25;24:7	snapped (3) 117:19,20,20	space (1) 103:7	standing (8) 51:10;59:11; 107:5,10,11,13; 120:22;121:25	S-t-e-v-e-n (1) 9:12
sixty-five (1) 61:1	SOB (1) 155:23	speaking (16)	start (11) 14:5;16:4,20,25; 32:21;37:15,16; 99:14;119:7; 169:10;171:19	stick (1) 47:8
skin (4) 97:17,20;113:5; 154:6	Soft (2) 93:3;156:12		staples (4) 132:15,16,25; 133:1	sticking (11) 28:4,5;44:4; 56:23,25;93:17; 94:1,3,10;102:6; 173:6
skinned (1) 54:17	Solitaire (1) 176:21		started (21)	still (29) 11:10,10,23; 14:3;21:9,25;22:9; 25:5;30:11;31:21, 21;32:15;35:10;
skin-to-skin (1) 97:15	solitary (20) 68:6;70:15,16; 86:3;174:5,7,8,9, 13,20,21;175:10, 15,17,20;176:3,8, 12,19,20			
skip (1) 39:7	somebody (23) 43:7;45:20; 47:14;51:8;69:18; 70:3;73:4,6,13; 74:13;82:22;92:12; 108:6;109:8;145:1, 23;148:21;149:8; 151:22;153:4; 172:13,15,16			
skull (2) 83:1,4				
slammed (6) 26:14;52:13,14; 53:20;115:12,17				
slamming (1) 53:16				
slams (1) 25:15				
slang (1)				

43:25;44:4;46:19; 51:18;100:4;108:1; 128:1;129:10; 137:1;156:18; 157:6;167:18; 173:6;174:1;184:8; 185:15 stint (1) 18:9 STIPULATED (5) 2:3,9,15,21;6:6 stipulation (1) 5:5 stitch (3) 77:2;79:21;80:2 stitched (1) 77:1 stomped (1) 84:16 stood (2) 52:22;172:21 Stop (19) 34:13;36:13,14; 45:15,15;48:12; 49:13;59:12,24; 63:16;87:25;120:1, 1;135:10;144:9; 170:7,25;172:1; 180:1 stopped (13) 16:22;28:19; 52:22;57:17;83:11; 131:3;132:13,13; 146:5,6,10,12; 171:24 story (3) 50:10;111:19; 130:5 straight (8) 37:22;64:13; 72:23;74:12,13; 82:21;103:10,11 straighten (1) 82:23 strange (1) 181:5 strapped (2) 27:7,7 Street (12) 2:7;5:6;26:8; 77:1;96:13;106:13; 124:18;131:5; 138:15;143:11; 145:25;188:1 streets (5) 130:21;145:16; 151:7,9,9 strictly (2) 43:12;53:10 strike (1) 84:6 struck (2) 28:14;84:13	structure (3) 54:11,15,16 stuck (1) 152:19 stuff (15) 22:25;36:24; 53:8;57:16;117:2; 129:1,4,15;135:13; 139:22;149:6,20; 156:24;160:2; 189:20 subdue (1) 60:3 subdued (1) 48:13 subject (5) 7:2;160:25; 162:5,8;177:15 submit (2) 83:12,13 subpoena (1) 115:15 Subsequent (2) 69:2,10 subsequently (1) 75:13 substantiate (2) 41:23;84:23 sudden (1) 51:21 suddenly (1) 49:23 sue (6) 19:20,20,21,22, 23,24 sued (1) 150:12 sufficient (1) 185:22 suggested (1) 71:11 suing (1) 48:6 suit (1) 124:19 Suite (2) 2:7;5:7 suits (1) 26:16 sung (1) 147:23 super (3) 127:10;136:20; 159:6 superficial (1) 156:15 supervisor (1) 105:19 support (5) 18:16;36:21; 83:2;168:10,15 supported (1) 65:9	supposed (8) 78:18;98:5; 113:15;136:15; 166:11,15,18; 182:25 supposedly (1) 21:4 sure (19) 6:18;8:14;36:6; 37:1,8;54:17;58:7; 60:16;83:17;90:14; 112:8;142:8; 150:25;153:21; 163:15;169:21; 170:2;188:18; 189:8 surgery (12) 165:14,18,21,24; 166:1,5,7,8,11,14, 24;186:18 surreal (1) 32:3 surrounding (2) 82:18;177:14 survive (1) 17:14 surviving (1) 18:21 sustained (1) 170:5 swap (1) 105:9 swapped (2) 110:16;114:22 swelling (3) 155:20,21; 156:10 swing (1) 78:7 switch (2) 89:4;110:3 switched (1) 111:17 swollen (5) 63:25;70:22; 72:16;73:9;186:12 sworn (2) 5:13;6:17 swung (1) 62:1 syndrome (3) 180:18,19,20 synopsis (1) 15:24 system (3) 138:12;139:12; 141:2	21:19;29:8,20, 22:31;16;38:13; 40:11,11,16;41:4,8, 10,14,22,25;42:4, 21;43:7;44:14; 47:11,18;52:7; 84:5;106:8;108:6; 109:8;111:17; 149:17 tagged (3) 41:16;54:21,22 tags (9) 41:17,19;42:7; 54:21;105:9;110:3, 16;114:22;148:13 talk (18) 33:21,24,25; 40:6;56:5;69:17; 93:22;109:21; 127:24;129:18; 147:1;149:11,20; 156:10;169:22; 175:6;188:13; 189:25 talked (5) 66:25;67:1,4; 129:20;189:18 talking (51) 33:8,18;37:7,19; 39:2,19;40:5;43:4; 51:19;61:15;62:12, 23;63:1;65:20; 67:9,11,12;72:7,8; 81:12,14;83:18; 87:25;90:22,23,24; 94:2;96:9,21; 97:24;98:9;123:9, 25;125:25;131:2; 132:12;139:19; 141:6;147:5;148:4, 6,11;149:25; 151:20;164:25; 165:2;172:5; 177:21,23;183:5,7 talks (1) 95:13 tall (1) 113:7 tape (3) 42:12,13;55:23 Target (1) 15:25 targeting (2) 151:25;152:2 tase (1) 30:18 tased (4) 59:8;97:11; 119:17,18 taser (27) 31:13;43:19,20; 44:6,11,13,15,18, 18,19;45:2,7,20;	46:1,4,7,12,14,23; 62:4;97:13;100:12; 108:6;109:8;110:3; 111:17;124:1 tasered (1) 31:15 tasering (2) 44:11;124:1 tasers (2) 46:6;181:2 tases (2) 100:10;124:12 tasing (4) 30:6;59:18; 100:2;124:2 tasted (1) 30:20 tattoo (1) 133:2 tattoos (2) 132:16;154:7 taunted (1) 29:17 tear (1) 157:11 tears (3) 27:8;157:1; 180:6 tech (1) 36:21 Technical (5) 91:9;120:18; 146:19;161:3; 162:5 technically (2) 40:13;114:20 Ted (1) 18:9 Ted's (1) 17:11 teeth (171) 30:20;31:10; 38:15,15;56:1; 63:8,13,18;64:6,7, 7,7,9,11,16,18,19, 20,21,25;65:4,6,7, 10;72:5,6,7,7,9,13, 17,22,23,23;73:2,9, 17,21,24;74:1,3,3, 5,7,8,9,12;75:12, 13,18,20,21,22,23; 76:3,4,6,9,12,16, 19,20,23,24,25; 77:11,13,17,17; 79:12,14,15,18,20, 21,23;80:2,5,8,13, 15,17,20,24;81:1,1, 7,8,13,14,15,15,16, 17,19,20,21,24,25, 25;82:1,4,6,18,19, 20;83:7,20;84:3; 89:7;91:17;124:4, 6,7,15,16,20,24;
		T		
		tab (1) 36:11 tag (28)		

125:2,4,6,8,12,14, 17,20,20,22,24; 126:1,4,5,7,8,14, 15,16,17,19,19,21; 127:1,1,8,9,13,14, 16,18;154:6;170:6, 8,11,12,15,16,18, 23;171:3,5,8,10; 173:5,15,19,23; 174:3;179:14,17, 23;187:14 telephone (1) 150:23 telling (22) 38:20;50:22; 61:2;62:9;76:3,6; 78:9;89:14;102:2, 18,20,21;109:6; 127:2;139:7,25; 144:25;150:16; 168:16,18;170:22; 185:19 tells (1) 62:6 temper (1) 62:8 ten (12) 22:14,19;53:14; 70:9;84:11;85:15, 17;88:18;113:17; 159:3,3;163:23 tend (3) 7:17,20;16:8 terminal (2) 10:9;157:22 terminologies (1) 93:9 terminology (2) 21:8;94:7 terrorist (1) 21:17 terroristic (2) 21:21,23 test (6) 44:17,22;45:10, 23;47:1,12 testicles (2) 119:18;124:2 testified (20) 5:13;45:17;59:7; 63:6;64:21;74:2; 87:14;103:25; 119:14;125:19; 150:6,6;163:3; 164:2;170:25; 173:9,19,21;174:5; 177:17 testify (5) 9:7;49:1;79:22; 80:1;157:20 testifying (1) 34:9 testimony (20)	45:21,22;46:14; 79:5;80:11,12; 83:6,8,9,19,21,22; 106:24;125:8,10, 12;137:17,19,20; 160:7 Thanks (1) 153:22 therefore (2) 161:3;162:7 thereto (1) 2:20 thinking (1) 172:12 third (1) 32:7 thirty (1) 27:20 thorough (1) 169:5 thoroughly (1) 55:6 though (7) 6:18;19:15; 23:18;52:10; 162:16;179:14; 189:16 thought (19) 21:18;29:25; 31:24;52:12;57:21; 102:6,7,12;104:1; 115:14;135:2; 143:3;146:1;147:3; 157:8;158:9; 161:23;170:20; 177:21 thousand (6) 117:10;130:5; 134:6;151:17; 154:23,23 threat (3) 21:17,21;130:21 threatened (2) 38:8;131:5 threatening (1) 150:7 three (58) 12:15;13:18; 15:6;32:4;33:8,9, 10,17;34:10,12; 40:4,4,9,14,15; 42:11,14;49:24,24; 50:16,18;63:7; 65:21;74:2;75:24; 81:25,25;91:8; 98:24;99:1,24; 101:7;113:18,19; 114:19,20,23; 115:12,18;141:25; 142:8;143:17; 147:11;152:14,15, 16,24;163:14; 171:14,18,20;	172:8,18;173:10, 10,23;178:14,15 threw (5) 26:23;32:22; 49:24;53:11;100:2 throb (3) 26:25;27:1,1 throbbing (2) 18:7;26:25 throughout (1) 87:14 Throw (3) 27:4;50:5,16 throwing (3) 22:24;23:2,9 thrown (1) 172:3 thrust (1) 127:18 thugs (2) 131:1,1 thumbprint (1) 28:3 ticket (2) 19:15;21:24 tie (3) 112:13,15,17 tight (7) 28:25;29:1,1; 32:13,14,15;52:23 tilted (1) 64:14 Timberland (1) 183:8 times (45) 20:5;25:4,5; 43:21;55:6,7; 66:18,19,20,24; 68:3,10,12,17,19, 23;70:10,10,13,19; 84:6,9,11;94:23; 105:2;119:17; 124:1;130:6; 131:20,23;132:4; 134:19;135:18,22; 137:16;139:6,6,19, 23,25;153:7; 154:23,23;157:7; 180:12 tip (1) 128:5 tire (1) 16:25 tires (1) 17:6 tissues (1) 93:3 titles (1) 139:22 today (3) 9:4;92:20; 189:19 Today's (1)	5:25 toe (43) 38:16;56:22; 57:3,6;64:1;70:23, 25;71:4;72:17; 73:8;86:17,20,25; 87:8;89:10,12,13, 14,16,23;90:3,12, 13,16,17;91:2,20, 25;92:7;95:4; 154:20,20;155:3, 10,11,16,24; 156:16;165:12; 167:2,8,11;183:6 toes (2) 56:2;180:21 together (8) 11:15;77:2,3; 78:2;117:15; 133:24;143:24; 144:8 told (21) 8:15;22:7;38:18; 45:14;78:15;86:3, 4,21,22;130:19,19; 132:18;134:16; 141:3;145:13,21; 148:16;149:1; 153:2;178:4;181:2 tongue (5) 75:4,6,7;81:9; 128:6 tons (1) 186:25 took (19) 17:7;30:16;56:8; 59:6;60:11;70:13; 76:20;78:7;99:7; 118:15,15,25; 120:10;123:9; 157:24;158:14; 172:15;185:8,16 tool (1) 117:3 tooth (43) 56:18;63:25; 65:14;67:2;69:11, 14,17;70:23;72:11, 11,24,25;74:17,17, 22;75:2,8,25;76:1, 2;80:12;81:9,9,12; 82:8,9,10,16,18,25; 83:1,3;124:21,25; 125:1,15;126:2,3; 155:16,18;156:9; 173:24;174:1 top (12) 35:7,10;61:13; 64:9;82:4,6;92:21; 100:3,4;123:15; 126:2,12 topical (2) 185:11;186:12	touch (8) 26:18;47:24,25; 48:1,5;103:12,14; 157:2 touched (5) 48:1;50:2; 122:24;179:18; 189:18 tow (3) 19:13,23;165:10 towards (2) 28:18;49:7 towed (2) 16:11;145:24 towing (19) 16:9,9,10,17,17, 17,18,18,22;17:3, 13,19;152:6;164:4, 25;165:5,8;171:9, 10 traffic (2) 19:16,18 trained (1) 57:1 training (1) 16:20 transcribed (2) 120:2;122:18 transcript (9) 34:8;35:12;36:9, 25;37:6,12;113:23; 119:9;124:25 translate (2) 146:19,22 transpired (1) 33:2 treat (1) 184:24 treatment (7) 39:13;154:13; 165:11;167:2,3; 168:11;180:8 trespassing (1) 24:11 trial (4) 2:19;13:9; 115:14,16 trick (1) 8:17 tried (11) 17:11;28:21; 33:1;77:2;79:21; 80:14;83:10,12,13; 151:20;171:9 trigger (1) 23:16 triplicate (1) 142:15 trooper (1) 45:14 trophies (1) 125:23 trouble (2)
---	--	--	---	--

47:9;141:1 truck (3) 19:13,23;165:10 true (7) 15:10;55:2;65:6; 68:11;76:1;88:23; 175:25 Trust (5) 52:15;118:12; 130:12,16,23 truthfully (2) 8:13,18 try (6) 7:20;18:17;62:4; 73:3;116:17;187:4 trying (30) 10:8;20:6;27:11, 13;35:13;36:19; 46:16;54:14;57:8, 8;60:3;70:1;73:3; 78:5;79:1,11,13; 84:10;86:7;89:4; 97:7;99:8,13; 101:13;103:8; 124:1;125:5,16; 139:18,24 tumor (1) 93:15 tunnel (3) 180:18,19,20 turn (4) 8:2;17:6;116:15; 185:1 turned (4) 29:24;40:12; 71:5;122:8 turns (1) 155:4 twelve (1) 85:18 twenty (6) 33:24;164:7,8, 21;165:6;185:14 twenty-five (1) 151:17 twice (5) 66:1,3;67:17; 70:3;84:17 twinge (1) 51:21 two (72) 8:7;12:17;14:21; 15:6;18:18;24:24; 25:4;37:19;39:19, 21,25;40:10,10; 52:6;53:21;57:24; 65:4;66:10,18,19, 20,24;67:22;68:3, 18,23;70:10,10,19; 72:16;73:8,21; 76:3,4,9,10,12,16; 79:12,14,15,20; 81:24;84:9;85:20;	111:21;114:10,12, 23;117:10;120:22; 123:7;124:16,24; 127:11;130:15; 134:6;142:8; 153:14;156:14; 162:10;163:22; 164:12;172:21; 173:5,6,10,16,20, 21;187:5,5 Tylenol (11) 185:5,7,7,8,10, 11,11,12,18,21 Tylenols (1) 185:14 type (17) 19:16;27:1; 31:25;50:10;54:17; 61:10;71:15;98:1; 104:22;111:25; 123:23;128:4; 131:17;151:14,15; 180:24;181:1 typically (3) 8:8;107:12; 139:22 U Uh (1) 80:10 umpteenth (1) 149:4 unable (3) 121:14,17; 129:25 unaware (2) 45:19;137:17 unbuttoned (2) 98:14;99:10 unchecked (1) 184:10 uncuffs (1) 30:11 under (13) 5:24;9:4,21; 34:9;35:16;81:15, 17;102:3;135:17; 141:15;156:7; 164:9;175:11 Understood (5) 15:23;19:4; 93:25,25;121:12 undress (1) 123:25 unemployable (1) 57:19 unemployed (2) 17:17;18:8 unemployment (1) 18:11 unh-unh (15) 7:17;67:15;	82:21;97:9,9; 104:16;107:7,7; 123:21;142:17; 149:23;157:11,12; 164:22;187:12 uniform (16) 38:21,21;61:11, 13;100:2;106:5,7, 7,8;112:13,14,19, 19,20,20;113:1 uniforms (4) 61:8,8,9,10 Unintelligible (4) 115:10;125:11; 140:6;156:17 Union (5) 10:3,14,15,17; 12:1 United (1) 5:21 unless (5) 42:4;139:23; 165:20;189:11; 190:4 unlock (2) 16:20,24 unlocking (1) 17:13 unmute (1) 92:14 unnamed (3) 33:9;50:17,18 unnecessary (1) 85:15 untruthful (2) 45:23,25 up (153) 16:23;17:4,12, 25;21:1,23;23:8; 26:22;28:4,13,20, 21,24;31:17;34:17, 20,23;35:13,14; 36:1,19,20;41:16; 43:15;49:6,8,12,13, 14;50:3,14,23; 51:3,11,11,20,22; 52:6,22;57:22; 61:21,25;62:10,16, 19;65:4,7;66:18; 68:19,24;69:23; 70:7,18,18;71:3,10, 12,12,16;72:17; 76:10;77:20,24; 79:12,19,20;82:19; 83:1,10;85:14,17; 87:2;91:13;93:17; 94:1,3,10;95:13; 96:20,21;97:1; 98:1,1,2,5,6,7,16, 18,20;99:2,24; 100:7;101:1,10,11, 22;102:14,15,17; 103:17,20,21;	105:11;115:16; 116:6;118:17; 122:3,21;124:11, 13,14,19;126:12; 127:20;130:11; 131:9,15;134:2,3; 137:12;138:15,20; 140:7,7;142:23,24; 145:23;146:10; 148:15,17,21; 149:2;150:8; 151:20,24;152:4; 156:22,24;157:11, 17;162:4;164:10, 12;170:17;173:12, 25;174:1;181:5; 187:20,20;188:3; 190:3 update (1) 178:18 upon (2) 15:8;37:14 upper (6) 63:25;70:22; 155:16;156:8,9; 186:4 upset (1) 49:4 upstairs (2) 66:7,8 urgent (2) 154:11;155:13 use (19) 6:22;7:16;41:14, 22;42:7;43:7; 44:17;46:23;47:11; 58:8;75:3;79:1,11, 13,17,18;141:1; 163:21;177:14 used (17) 9:18;44:19;45:8, 20;46:1;48:25; 79:15;87:15;94:20; 96:12;116:25; 158:3,19,21; 159:25;164:3; 179:4 using (8) 35:19;44:19; 46:4;117:2;143:11; 145:16;151:7,8 usually (2) 51:14;61:3 V Valerie (10) 110:13,13,15; 111:5,7,8,9,11; 188:15,15 value (1) 187:17 various (1)	6:10 Vegas (1) 12:23 vehicle (1) 171:13 V-e-n (1) 9:14 verbal (1) 85:24 verbally (1) 94:15 verifies (2) 54:4,7 Veronica (2) 111:11;188:15 version (1) 35:19 versus (1) 93:1 via (1) 6:4 victim (1) 161:1 Victor (1) 5:20 video (17) 6:4;8:9;28:18; 31:11;35:17;39:17, 18,23;40:4,5; 83:12,13;96:5; 114:18,19,21; 142:24 videos (1) 39:14 videotape (3) 51:5;60:9;72:15 view (1) 35:1 violated (1) 20:23 violating (1) 172:2 violation (6) 23:12,17;55:13; 104:10,12;133:13 Visible (1) 154:6 visit (2) 88:15;169:1 visited (1) 70:11 visiting (2) 10:6;127:22 visits (4) 168:13;169:13, 23;182:2 W waist (2) 98:7;99:11 wait (7) 7:24;8:2;71:11;
--	---	--	--	---

120:1;153:1; 165:17;180:1 waiting (4) 105:6,8;109:24; 110:2 waived (2) 2:11,23 wake (15) 49:12,13;50:13; 51:11,22;98:18; 100:7;101:10,11; 124:13,14;181:5; 187:20,20;188:3 waking (2) 50:3;103:17 walk (14) 28:20,21,24; 29:2;96:11,13,18, 21,23;102:14; 106:1;181:11; 185:14;188:1 walked (12) 21:20;42:16; 43:2;61:21;101:22; 102:15,17;104:8; 105:24;107:17; 114:9;141:16 walking (3) 50:23;53:4; 181:11 walks (1) 31:19 wall (10) 23:6;25:12,13, 13;26:19;85:12; 123:13;124:17; 132:7,7 wants (2) 96:7;152:2 warden (5) 128:21,22,22,23, 24 warrant (4) 21:2,3;39:6; 115:1 watched (2) 172:22,23 way (25) 23:19;25:3; 27:14,15;32:14; 80:23;83:1;84:11; 85:14;98:4;99:6; 112:1;118:6;125:6, 7;129:13;130:6; 134:21;139:13; 145:2;146:9;149:7; 167:10;170:25; 180:5 ways (1) 23:11 weak (1) 22:20 weapons (1)	25:22 wear (3) 112:19;157:7; 167:13 wearing (8) 29:22;38:20,21; 40:16;47:18;54:21; 99:17;112:10 web (2) 35:8,10 weed (4) 151:18;187:4,5,7 week (3) 18:18;106:19; 111:17 weekend (1) 9:3 weeks (5) 15:6;143:17; 178:14,14,15 weighs (1) 164:7 weight (1) 113:9 weird (1) 36:12 welcome (1) 153:23 Well-defined (1) 92:24 weren't (6) 20:1;140:15; 142:6;164:25; 171:1;177:8 whatnot (1) 27:14 What's (16) 10:2;14:14;23:1; 32:4,23;58:10; 121:14,17;136:10; 144:12;149:22; 161:21;169:19; 171:16;178:5; 181:12 wheel (3) 27:4;152:18,18 wheels (4) 152:19,19,20,23 Whenever (1) 31:5 whereupon (1) 5:9 wherever (1) 105:25 white (7) 60:23;64:11; 65:10;82:20,21,21; 140:19 whole (11) 14:4;30:10; 36:16;62:18;65:15; 106:7;113:1; 119:18;120:8;	121:12;128:24 who's (6) 11:1;13:10,18; 38:10;39:2,3 wife (2) 133:19;134:2 WiFi (1) 131:11 WILLIAM (7) 2:5;5:8,12,17,18; 9:11;160:25 winch (2) 152:17,18 window (2) 22:25;124:17 within (1) 71:9 without (5) 41:10;42:3; 85:18;165:16; 174:14 witness (6) 2:11;5:8;19:25; 20:3;163:2,3 witness's (1) 93:22 woke (6) 49:6,8,14;51:3; 103:20,21 woman (1) 149:13 wondering (1) 79:10 Woods (44) 60:13,13;63:14, 24;65:1,4,7;66:5, 14;67:22;68:1; 70:21;72:12,14; 73:8,15,16,18; 75:19;76:5;77:7, 18,18,21,22;78:3, 13,17,19;79:1,15; 83:6,9,10,20,22,23; 86:14;89:24;90:4, 20,24;91:1;97:11 word (9) 49:1;87:15; 94:21;107:20; 125:4,5;149:8; 179:4,10 words (10) 80:3;108:11,12; 110:12;111:16,18; 120:3,8;130:14; 164:3 work (12) 17:11;18:23; 23:3;36:21;51:9; 112:7;129:15,15; 152:5,5;170:21; 179:20 worked (6) 15:25;16:16,18;	17:15;146:1;165:4 working (9) 15:17;16:22; 19:1;24:20;107:6; 146:5,6;165:9; 185:21 works (3) 9:4;109:4; 185:18 world (2) 128:24;158:25 worse (5) 97:6;140:8; 156:23;157:7; 187:11 worst (3) 49:13;117:12; 176:13 worth (1) 15:19 wound (3) 21:23;119:3; 157:17 wow (1) 101:17 write (16) 7:14;38:23;53:8; 135:2,3,11,13; 136:3,4,5,6,14; 138:13;141:10; 142:1;157:4 writing (7) 39:5;78:14; 138:5;150:14; 189:9,13,22 wrong (5) 23:18,19;28:7; 62:11;73:8 wrote (12) 43:10;73:15; 128:21;133:16,25; 134:4;135:15; 138:10,11;141:9; 188:17,20	18:19 yards (1) 18:18 year (11) 12:18,25;15:18, 21;21:11;23:20; 117:9;132:20; 134:5,12;145:10 years (13) 15:9,12;16:12; 17:20;22:15,19; 53:14;57:24;61:1; 142:8;158:20; 159:3,3 Yep (1) 107:2 young (2) 14:17;53:20
Z				
Zero (1) 149:21 zip (1) 98:1 zipped (1) 124:19 Zoom (1) 36:1				
0				
00054 (1) 43:19 00092 (2) 153:11,21 00093 (1) 153:24 00094 (1) 153:25 00095 (1) 155:12 00103 (1) 163:10 00105 (5) 160:4,17;161:15, 20,21 00847 (1) 35:22 00854 (1) 37:16 00857 (1) 39:10 00862 (1) 119:8 00888 (1) 168:23 02350 (1) 5:21 0733 (1) 92:22 0734 (1) 69:1				
X				
x-ray (1) 186:10 x-rayed (2) 186:17,17 x-rays (4) 184:21;186:1,5, 16				
Y				
y'all (9) 12:11;104:24; 108:11;110:10; 116:15;131:2,11; 146:13;147:5 yard (1)				

1	10:18;117:12,12, 16:139:5;165:6,7	4	2:6;5:6;10:1
	2015 (2)		9:14 (2)
1:19 (1)	164:18;165:7	4 (1)	5:8;6:2
5:20	2016 (29)	10:10	9:18 (1)
10:14 (1)	10:18,21,24;	40 (1)	153:18
6:1	11:5,6;20:10;	17:15	9:27 (2)
100 (2)	24:14,16;25:24;	42 (1)	69:4,5
2:7;5:7	58:19,25;87:1;	154:18	9:28 (1)
12 (1)	105:12;119:12;	43 (1)	154:18
24:23	140:21;145:4;	177:11	9:30 (1)
12:30 (2)	154:19;155:14;	45 (1)	69:19
113:18,19	158:18;164:15,23;	176:23	9:45 (1)
13 (1)	165:2,8;182:3,3,9,	450 (1)	68:15
171:19	14;183:19,23	60:18	
14 (2)	2017 (13)	5	
17:4;171:18	17:4,10;21:13;	5/18/16 (1) 92:21 5/18/2016 (1) 86:16 5/3/16 (1) 78:5 5:41 (1) 155:13 5:44 (1) 63:11 5:54 (4) 63:19,23;65:1; 85:10 50 (1) 17:15 5191 (2) 10:3;145:18 5th (1) 119:11	
15 (2)	22:10;23:23;37:9;		
10:19;173:4	42:17;47:5;113:22;		
15th (4)	146:2,3,9;170:21		
59:1,2,3,4	2018 (9)		
16 (1)	23:22;127:22;		
164:18	134:11,13,15,19;		
16034B (1)	139:2;141:14;		
78:4	169:1		
16th (4)	2019 (7)		
59:1,2,4,4	144:24,24;145:1,		
170 (1)	12;146:7,10,10		
113:10	2020 (3)		
17th (1)	2:8;5:7;6:1		
137:24	23rd (1)		
18 (1)	109:16		
23:23	24 (1)		
180 (2)	92:19		
113:10,10	24th (1)		
18th (3)	109:16		
86:25;144:22,25	26th (1)		
19 (2)	37:9		
5:7;6:1	285 (2)	7	
1975 (1)	16:24;165:7	7:34 (1) 69:2 7:45 (1) 66:13 7th (14) 68:2;86:2; 135:23;137:24; 138:16;140:9; 174:6,19,20;176:4, 8,13,17;177:1	
10:1	2nd (3)		
19th (4)	26:2,4;109:13		
2:7;94:25;95:13;			
97:4	3	8	
1st (1)	3 (1)		
109:13	154:18		
2	30 (2)		
2 (1) 25:24 2:30 (1) 24:24 2:50 (3) 60:19;63:24; 91:8 2011 (8) 19:4;20:9,11,16, 17;22:13;139:4; 157:13 2013 (1) 17:4 2014 (7)	95:23;176:23	80 (1) 92:20 84 (1) 92:20 88 (1) 92:19	
	32 (3)		
	168:19,22;		
	169:10		
	33 (1)	9	
	168:19		
	34 (1)	9 (3)	
	168:19		
	35 (1)		
	168:19		
	3rd (9)		
	26:2,4;59:6;		
	66:13;69:2;109:13,		
	15;155:13;158:17		